

FY2026 Personal Information Protection Commission (PPC) Activity Policy

April 1, 2026

Personal Information Protection Commission (PPC)

To achieve the objective in Article 1 of the Act on the Protection of Personal Information (Act No. 57 of 2003; referred to below as the "APPI"), namely, to protect the rights and interests of individuals while ensuring the smooth and proper management of the processes or services of administrative entities (collectively refers to administrative organs, local government organs, incorporated administrative agencies or other prescribed organs, and local incorporated administrative agencies; the same applies below), while also ensuring the due consideration of the value of personal information, the government has formulated the Basic Policy on the Protection of Personal Information (Cabinet Decision of April 2, 2004, as partially revised on April 1, 2022; referred to below as the "Basic Policy") under Article 7 of the APPI for promoting policy measures on the protection of personal information in an integrated and comprehensive manner. This Basic Policy establishes the fundamental direction on moving forward policy measures to protect personal information and actions to be taken by the government, as well as the basic matters to be addressed by diverse actors in public and private sectors, including local governments, incorporated administrative agencies or other prescribed organs, local incorporated administrative agencies, businesses handling personal information, and certified personal information protection organizations (referred to below as "Certified Organizations"), requiring these actors to engage in specific practices for protection and appropriate and effective utilization of personal information.

Further, in order to fulfill its duty to ensure the proper handling of personal information in accordance with Article 131 of the APPI, lay the foundation for building public trust in the proper handling of personal information, and ensure the sense of safety and peace of mind of the citizens, the Personal Information Protection Commission (referred to below as the "PPC") has formulated the Organizational Philosophy of Personal Information Protection Commission (established by PPC on February 15, 2016, as partially revised on March 30, 2022; referred to below as the "Organizational Philosophy"), and the Global Strategy of the Personal Information Protection Commission for conducting international cooperation affairs under its jurisdiction as provided in Article 132 of the APPI from a medium- to long-term perspective (established by PPC on April 1, 2026; referred to below as the "Global Strategy").

The PPC has established this activity policy to guide its activities for FY2026 (from April 1, 2026 to March 31, 2027), for appropriately acting as the central authority and fulfilling its role as a general policy coordinator and supervisor for personal information protection system, and for ultimately ensuring the proper handling of personal information as well as the safety and security of the general public in keeping with the Basic Policy, Organizational Philosophy and

Global Strategy, pursuant to the APPI and the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Act No. 27 of 2013; referred to below as the "MY NUMBER Act"). This policy also seeks to communicate the direction on these activities to the broader public, with the goal of earning and maintaining public trust.

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I. Basic Approach

1. Act on the Protection of Personal Information

In light of international trends related to the protection of personal information, advances in information and communications technology, and the creation and development of new industries that use personal information, the PPC will proceed with the planning and formulating national policies concerning personal information, etc. (meaning personal information, pseudonymized personal information, anonymized personal information, and information related to personal information; the same applies below), including measures to be taken under Article 10 of the Supplementary Provisions (referred to below as the “Triennial Review Provision”) of the Amendment Act of the Act on the Protection of Personal Information, etc. (Act No. 44 of 2020; referred to below as the “2020 Amendments”).

The PPC has jurisdiction over the monitoring and supervision of the handling of personal information, etc. by businesses handling personal or other related information (meaning a business handling personal information, business handling pseudonymized personal information, business handling anonymized personal information, and business handling information related to personal information; the same applies below) and administrative entities. In order to fulfill its role and ensure the proper handling of personal information, etc., the PPC will conduct appropriate supervision over domestic and foreign businesses handling personal or other related information effectively and efficiently and carry out effective and efficient monitoring of administrative entities by investigating them actively. The PPC will also actively engage in information dissemination and publicity on measures for managing the security of personal data, etc., to businesses and administrative entities.

2. MY NUMBER Act

As the PPC has jurisdiction over the monitoring and supervision of the handling of Specific Personal Information by businesses and administrative entities, the PPC will conduct appropriate, effective, and efficient monitoring and supervision in order to ensure proper handling of Specific Personal Information.

The PPC will also revise guidelines, etc. as necessary and actively engage in information dissemination and publicity.

As regards the Specific Personal Information Protection Assessment (it is the equivalent of the Privacy Impact Assessments (PIA) conducted in other countries, referred to below as the “Protection Assessment”), the PPC will continue to operate it according to the purpose and provisions of the MY NUMBER Act. In addition, the PPC will conduct a review the Specific Personal Information Protection Assessment Guidelines (Public Notice No. 4 of 2014 by the Specific Personal Information Protection Commission; referred to below as the “Assessment Guidelines”) based on the provisions in Article 27, paragraph (2) of the same Act.

The PPC will continue to actively promote initiatives that contribute to the increased use

of information linkages for processes specified by Prefectural/Municipal Ordinance using MY NUMBER.

3. International Cooperation

With the importance of the secure and seamless cross-border data transfer, including personal information, has further increased with the development of digitalization, the Government of Japan is promoting "Data Free Flow with Trust" (DFFT) as a whole-of-government effort. In Japan, the PPC has played a leading role in the promotion and operationalization of DFFT at the international level, particularly in the field of personal information protection and privacy.

In FY2026, the PPC does not take an exclusive approach, but aims at realizing an international environment with interoperability, while respecting the diverse personal information protection systems and international frameworks of relevant countries and regions, as well as taking into account the needs of businesses.

II. Specific Initiatives

1. Act on the Protection of Personal Information

(1) Responses to Triennial Review Provision

The Triennial Review Provision in the 2020 Amendments stipulates that the government "review the implementation status of the new Act on the Protection of Personal Information every three years after its enforcement, taking into account international trends relating to the protection of personal information, advances in information and communications technology, and the creation and development of new industries that use personal information. When deemed necessary, the government shall take appropriate measures based on the results of such review." The PPC has been conducting the mandatory review for the necessary measures since November 2023.

<Initiatives in FY2025 (from April 1, 2025 to March 31, 2026)>

On March 5, 2025, the PPC published the "the Approach to Institutional Issues Related to the Act on the Protection of Personal Information", summarizing the basic approaches to specific regulations under review, and publicized comments received from stakeholders, including experts, the economic organizations, and consumer organizations sequentially by April 16, 2025.

The PPC participated in the "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, just as it did in FY2024. The Triennial Review of the APPI was discussed in this Study Group, and the Meeting on Digital Administrative and Fiscal Reform adopted on June 13, 2025, the "Basic Policy on the Ideal Form of Data Utilization Systems" referring that the government "aims to finalize a well-balanced draft amendments of the APPI and submit it to the Diet at an early stage." The Cabinet then adopted the "Priority Plan for the Advancement of a Digital Society" incorporating this initiative on the same day.

This was also referred in other government policies, such as the "Basic Policy on Economic and Fiscal Management and Reform 2025" (Cabinet Decision dated June 13, 2025).

While continuing in-depth discussions with stakeholders, in collaboration with the initiatives of the government as a whole, the PPC adopted the "System Reform Policy under the Triennial Review of the Act on the Protection of Personal Information (APPI)" at its 347th meeting and publicized it on January 9, 2026. This document addresses the four major challenges, i.e., the "Promotion of Appropriate Data Utilization", "Establishment of Regulations that Appropriately Address Risks", "Prevention of Inappropriate Use", and "Ensuring the Effective Enforcement of Compliance Obligations."

Following further coordination with stakeholders, the Amendment Bill of the Act on the

Protection of Personal Information, etc. was registered for submission to the 221st session of the Diet (special session).

In this way, the PPC steadily progressed with the Triennial Review while maintaining detailed coordination with the stakeholders.

<Activity Policy for FY2026>

The PPC will make necessary arrangements for submitting the Amendment Bill of the Act on the Protection of Personal Information, etc. to the Diet and the enactment process including deliberation at the Diet. After the bill is enacted, the PPC will take necessary steps to ensure the smooth enforcement of this amending Act based on the discussion under the Triennial Review Provision (referred to below as the "Amendment Act following the Triennial Review").

More specifically, the PPC will arrange the necessary amendments to the related rules, including the Cabinet Order, the Enforcement Rules, and the Guidelines, in a timely manner. This will enable businesses handling personal information and administrative entities to prepare appropriately for the upcoming changes. The revision of these rules will take into full consideration the input of a diverse range of experts and stakeholders, in order to protect the rights and interests of individuals, while paying due regard to the value of personal information.

Furthermore, the PPC will actively inform the public, businesses handling personal information and administrative entities about the purpose and specific details of the Amendment Act following the Triennial Review, using easy-to-understand materials. The PPC will actively promote awareness of the revised system through various means, including information dissemination via official website, social media platforms and public briefings, while also providing thorough responses to inquiries received at the general inquiry line for the APPI (referred to below as the "Inquiry Line for the Act on the Protection of Personal Information"), in doing so, it will work in coordination with voluntary initiatives and programs of Certified Organizations and other private businesses.

(2) Forums for Continuous Exchange of Opinions with Experts and Stakeholders

At its 319th meeting held on March 26, 2025, the PPC established the Council on the Personal Information Protection Policy (referred to below as the "Council"), which meets about twice a fiscal year. This Council aims to cultivate mutual understanding regarding personal information protection policy through transparent and continuous engagement with experts and stakeholders from across sectors, and to discuss more inclusive, practical themes and overarching personal information protection policies by grasping trends such as the protection and utilization of personal information in Japan and abroad, the digitalization of society, and technological developments including the rapid spread of artificial intelligence (AI).

<Initiatives in FY2025>

On April 28, 2025, a preliminary meeting was held to exchange opinions on challenges and future perspectives of personal information protection policy.

At the first meeting held on September 19, 2025, the issue of voluntary initiatives by businesses aimed at securing trust from individuals and consumers was adopted as the primary issue for discussions in FY2025. In line with this, at the meeting, participants discussed and exchanged opinions about the voluntary efforts of businesses and incentives for these efforts on the same day.

At the second meeting held on February 2, 2026, the participants exchanged opinions on the issue of governance structure of businesses adapted to digitalization.

In this way, the PPC made progress in efforts for ongoing engagement with experts and stakeholders across different sectors, with a view to facilitating discussions on more overarching issues and personal information protection policy in general in light of reality.

<Activity Policy for FY2026>

The Council will adopt the issue of how to build a new trust relationship between users and providers of services amid the increased use of AI and other digital tools as the primary issue for discussion in FY2026 at its second meeting and engage in ongoing dialogue with experts and stakeholders across various sectors to cultivate mutual understanding regarding the government's policies on personal information protection. The Council will meet about twice a year with the aim of contributing to discussions on more overarching issues and personal information protection policy in general in view of reality.

(3) Initiatives for the Smooth and Appropriate Application of the APPI in Administrative Entities

<Initiatives in FY2025>

To ensure the proper handling of personal information, etc. in administrative entities, the PPC provided advice, consultation and helpful information for the practical application of related systems. Furthermore, the PPC organized practical training sessions on a prefecture basis for local government officials to enhance their understanding of the APPI. The PPC also produced internal topic-specific training videos on personal information protection systems for beginner learners, and made them available to local governments, etc. (collectively refers to local governments and local incorporated administrative agencies; the same applies below).

On 28 May 2025, the PPC formulated the “Guidance on Policy making in Accordance with Basic Principles of Policies Concerning Proper Handling of Personal Information etc.” as one of the tools that can be used by officials from government authorities in planning and developing policies on the handling of personal information, etc. smoothly. The PPC

also revised the “Guidelines on the Act on the Protection of Personal Information” (for Administrative Entities) (Public Notice No. 1 of 2022 by the Personal Information Protection Commission), the “Guides to Administrative Procedures on the Act on the Protection of Personal Information (for Administrative Entities)” and the “Q&A on the Act on the Protection of Personal Information (for Administrative Entities)”, with a view to further clarifying the criteria of "reasonable grounds" under Article 69, paragraph (2), items (ii) and (iii) of the APPI.

As mentioned above, the PPC provided administrative entities with support, including practical advice and consultation on the application of related systems. However, more needs to be done to ensure that personal information is handled properly by administrative entities.

<Activity Policy for FY2026>

The PPC will provide administrative entities with a wide range of support for the protection and proper and effective use of personal information.

More specifically, the PPC will continue to provide advice, consultation and helpful information for the practical operation of systems.

In addition, the PPC will engage in active discussions on revising the rules and guidelines that are helpful for the practical application of related systems. These discussions will take into account the practical needs identified through these initiatives, with the aim of further facilitating application and improving efficiency.

The PPC will also provide practical training sessions for local government officials on a prefecture basis, to enhance their understanding of the APPI, while taking their practical needs into consideration. The sessions will primarily target organizations that have not yet received them.

(4) Monitoring and Supervision Activities

(i) Monitoring and Supervision Activities

<Initiatives in FY2025>

The PPC conducted a study and analysis of reports on incidents involving the leakage etc. of personal data and personal information that the administrative entity holds in order to identify the causes and measures to prevent recurrence. In addition to these incidents reported, the PPC provided guidance and recommendations, as necessary, on cases of inappropriate handling of personal information etc. which were discovered by means other than the ongoing monitoring including said study and analysis on incidents reported. The PPC also exercised its authority of monitoring and supervision, such as requesting submission of reports or conducting on-site inspection, as necessary.

For cases in which the PPC has exercised its monitoring and supervision authority, the PPC published quarterly summaries of individual cases (breakdowns by cause and type of

attack in cases involving unauthorized access). The PPC also disclosed the specific details as necessary, including the specific names of the parties involved, and provided information and warnings with respect to specific sectors and categories, such as insurance agents and schools.

The PPC conducted a firsthand inspection of administrative entities selected according to an investigation plan approved by the Commission, in an effective and efficient manner in such ways as conducting an inspection together with an on-site inspection under the MY NUMBER Act. The PPC also surveyed all administrative entities on the status of implementation so as to collect basic information on their status of handling of personal information, etc. including the implementation of measures for managing security, and published a summary of the findings from the survey.

Further, in order to ensure appropriate and timely responses to the various methods employed in cyberattacks and other forms of unauthorized access, the PPC sought support from cybersecurity service providers for an analysis of cybersecurity-related incidents and encouraged its officials to enhance their expertise in the field of cybersecurity.

As mentioned above, the PPC appropriately implemented monitoring and supervisory measures to ensure the proper handling of personal information, etc. by businesses handling personal or other related information and administrative entities in an effective and efficient way.

<Activity Policy for FY2026>

In response to reports of incidents involving the leakage etc. of personal data and personal information the administrative entity holds, the PPC will conduct effective and efficient investigation and analysis of each case, including the identification of the causes and examination of measures to prevent recurrence, etc. Based on those activities, the PPC will exercise its agile monitoring and supervision authority by providing necessary guidance, advice, recommendations, etc. with the aim of preventing similar incidents from occurring. In addition to reports of leakage etc., the PPC will utilize information obtained through the Inquiry Line for the Act on the Protection of Personal Information, along with strengthening personnel for monitoring and supervision activity. And for cases of inappropriate handling of personal data and personal information the administrative entity holds identified through such ongoing monitoring, etc., the PPC will provide guidance, advice, and recommendations to businesses handling personal or other related information and administrative entities, and when necessary, request reports and conduct an on-site inspection with respect to businesses handling personal or other related information or request to submit materials and conduct a firsthand inspection with respect to administrative entities. In cases where these businesses handling personal information fail to correct their handling of personal information, etc. in accordance with recommendations, the PPC will exercise its monitoring and supervision authority in a timely and appropriate

manner, including the issuance of orders when necessary.

For cases in which the PPC has exercised its monitoring and supervision authority, the PPC will publish quarterly summaries of individual cases to support proper handling of personal information by businesses handling personal or other related information and administrative entities. In addition, among the cases in which the PPC has exercised its monitoring and supervision authority, the PPC will disclose detailed information on particular cases where the necessity and appropriateness of disclosure are recognized. For instance, cases involving services widely utilized by the general public where there is a high likelihood of infringement on individual rights and interests, and it is deemed necessary to disclose the case for alleviating public concern or preventing further harm, or cases where there is a high degree of seriousness, such as repeated and intentional violations of laws and regulations. In such disclosures, the PPC will publish the names of the entities involved, and explain the case overview, established facts, nature of the issue, legal assessment, and administrative response.

Furthermore, through these monitoring and supervisory activities, if cases such as leakage etc. are identified in specific fields or particular categories, the PPC will issue warnings or take other appropriate measures directed at the relevant parties, such as associated businesses, industries, or organizations, as necessary.

In addition, considering the fact that administrative entities have the authority to obtain personal information, etc. based on relevant laws and regulations, etc., and they could hold a large amount of personal information, which is different from the regulations and conditions of the private sector, it is particularly important to ensure transparency and trustworthiness in their handling of personal information, etc., therefore the PPC will conduct firsthand inspections and a survey of status, taking into account said points. The PPC will conduct a firsthand inspection of administrative entities selected according to an investigation plan approved by the Commission, in an effective and efficient manner in such ways as conducting the inspection together with an inspection under the MY NUMBER Act. The PPC will also survey all administrative entities on the status of implementation so as to collect basic information on their status of handling of personal information, etc., including the implementation of measures for managing security, and publish a summary of findings from the survey. Through these investigations, the PPC will aim to improve measures for managing the security of personal information, etc. across all administrative entities, clarify whether inappropriate or unlawful handling of personal information is being conducted in light of the APPI and various guidelines published by the PPC, and take timely action as needed such as to provide guidance, advice, recommendations, and other measures for cases of inappropriate or unlawful handling of personal information, etc.

Further, in order to ensure appropriate and timely responses to the various methods employed in cyberattacks and other forms of unauthorized access that result in the leakage,

etc. of personal information, the PPC will seek support from cybersecurity service providers for analysis of cybersecurity-related incidents and encourage its officials to enhance their expertise in the field of cybersecurity.

(ii) Cooperation with Related Ministries and Agencies

<Initiatives in FY2025>

The PPC engaged in initiatives to maintain close cooperation with the related ministries, government agencies, and organizations, in such ways as holding the quarterly Cybersecurity Liaison Meeting on the Act on the Protection of Personal Information to further strengthen cooperation with them and to study and analyze possible measures that can be taken as part of the various measures for managing security under the APPI. To this end, the PPC also generated a reference document titled “Key Perspectives for Effective Utilization of Digital Forensics in the event of Unauthorized Access ” that explains the measures to be in place in normal times, matters to be kept in mind in case of damage due to unauthorized access, and how to use forensic investigation, and shared information with a broader range of related ministries, agencies, and organizations at the Cybersecurity Coordination Meeting on the Act on the Protection of Personal Information which is held annually to maintain smooth and effective cooperation among these entities.

The PPC delegates another government agency to exercise its authority to receive reports of leakage etc. from businesses handling personal or other related information, pursuant to Article 150, paragraph (1) of the APPI. In this connection, the PPC held the annual “Liaison Meeting of Delegated Ministries and Agencies” to provide a briefing to officials in charge of delegated duties about the PPC's monitoring and supervision activity and specific tasks delegated to the respective agency, so as to deepen these officials' understanding of the APPI and ensure appropriate monitoring activity.

As explained above, the PPC made steady progress in building a cooperative framework with related ministries, agencies, and organizations to ensure the appropriate handling of personal information, etc. by businesses handling personal or other related information and administrative entities.

<Activity Policy for FY2026>

In FY2026, the PPC will hold the quarterly Cybersecurity Liaison Meeting on the Act on the Protection of Personal Information to study and analyze possible measures that can be taken as part of the various measures for managing security under the APPI, in cooperation with the related ministries, agencies, and organizations, and the annual Cybersecurity Coordination Meeting on the Act on the Protection of Personal Information to facilitate the effective cooperation among a broader range of related ministries, agencies, and organizations.

In addition, based on a cooperative framework established with relevant ministries,

agencies, and organizations (through memorandums of understanding concluded and shared in FY2020 (from April 1, 2020 to March 31, 2021)), the PPC will maintain close cooperation during normal times through joint efforts in education and training, information dissemination and publicity, and necessary information sharing. In the event of incidents such as leaks caused by unauthorized access, the PPC will respond in close coordination, including jointly verifying facts and taking appropriate actions, when necessary.

The PPC will also hold the annual Liaison Meeting of Delegated Ministries and Agencies to ensure that officials of delegated agencies, including newly appointed ones, gain a deeper understanding of the APPI, ensure appropriate monitoring activity, and appropriately handle personal information, etc. in cooperation with delegated ministries and agencies.

(iii) Initiatives Related to Cooperation with Foreign Enforcement Authorities

<Initiatives in FY2025>

The PPC participated in the regular meeting of the Global Privacy Enforcement Network (GPEN), an international enforcement cooperation framework for protecting personal information, and gained knowledge of recent enforcement initiatives of data protection authorities around the world. The PPC also took part in the GPEN Sweep, a program in which data protection authorities from different jurisdictions conduct research on common themes and compile the current status, challenges, and future prospects based on the results of the research.

In FY2025, the PPC steadily continued its efforts for building cooperative ties towards strengthened cross-border enforcement cooperation.

<Activity Policy for FY2026>

Considering the fact that the cross-border flow of data containing personal information, etc., is increasing, and there is a significant number of reported incidents involving leaks etc. from foreign-based businesses handling personal information providing services to individuals in Japan, it is necessary to ensure the proper handling of personal information, etc. by such businesses. To this end, the PPC will actively contribute to the activities of the Global Privacy Enforcement Network (GPEN), an international enforcement cooperation framework in which the PPC participates as a full member. Concurrently, by strengthening working-level collaboration with foreign enforcement authorities, the PPC aims to further accumulate experience and expertise in enforcement cooperation. Through these efforts to reinforce the enforcement cooperation framework, the PPC aims to ensure effective enforcement against foreign-based businesses handling personal information.

(5) Utilizing of Personal Information, etc.

(i) Promoting the Appropriate and Effective Utilization of Personal Information, etc.

A. PPC Business Support Desk

<Initiatives in FY2025>

The PPC responded to inquiries from businesses across various sectors, including IT, finance and insurance, and provided online consultations on the issues relating to the APPI through the PPC Business Support Desk.

In addition to providing businesses with advice appropriately through the PPC Business Support Desk, further efforts are needed to promote the appropriate and effective use of personal information, etc. by businesses.

<Activity Policy for FY2026>

The PPC Business Support Desk will appropriately respond to inquiries from businesses, etc. regarding legal interpretations. In addition, the PPC will actively disseminate information on the proper and effective utilization of personal information, etc., aiming to address both needs to protect individuals' rights and interests and to ensure the proper and effective use of personal information, etc. by businesses. The knowledge gained through consultation with the businesses will be generalized and made public in the form of guidelines, Q&As, and case studies. This information will be made available on the PPC's website and other channels to enhance understanding of the proper and effective utilization of personal information, etc. among businesses, etc.

Furthermore, the PPC will conduct a study on the latest technological trends related to the handling of personal information, etc. in order to grasp the potential impact on, and risks to, individuals' rights and interests resulting from the rapid changes to the environment surrounding personal information, etc., following the advance in digital technology, including such change as the increased availability and sophistication of AI and other tools for collecting and analyzing the wide variety of large amount of data, and the growing security risks.

B. Assistance for Administrative Entities in Utilizing Personal Information, etc.

<Initiatives in FY2025>

In accordance with the "Response Policy for the 2024 Proposals, etc. from Local Governments" (Cabinet Decision of December 24, 2024), the PPC conducted research to identify the status of affairs relating to the examination of proposals on the use of anonymized personal information the administrative entity holds, and provided reference information to local governments.

While the PPC continued its efforts to advance the proper and effective use of the personal information the administrative entity holds, further efforts are necessary to promote these initiatives.

<Activity Policy for FY2026>

The PPC will conduct a research to assess the emerging needs and issues associated with the use of personal information, etc. by administrative entities, so as to further promote the use while ensuring it is handled properly, in light of the transition to a digital society.

(ii) Initiatives Related to Certified Organizations

<Initiatives in FY2025>

The PPC made efforts to engage with Certified Organizations to understand the status of their activities, and sent lecturers to seminars and other sessions that the Certified Organizations sponsored.

The PPC also organized meetings to facilitate information sharing among Certified Organizations and practical seminars for covered businesses, to provide practical information including a explanation on the APPI.

While the PPC steadily implemented initiatives to help Certified Organizations in revitalize and enrich their activity, further efforts are needed to increase the use of the Certified Organization system.

<Activity Policy for FY2026>

To support the voluntary initiatives of Certified Organizations, the PPC will provide information, guidance, advice, etc. to help enhance their roles and functions, such as developing voluntary rules. This will include organizing meetings for information sharing and facilitating exchanges with the Certified Organizations.

The PPC will organize training sessions, seminars, etc. for covered businesses to further deepen understanding of the Certified Organization system. The PPC will also make efforts to ensure participants satisfaction.

Moreover, to further increase the use of the Certified Organization system, the PPC will promote the use of the sector-specific Certified Organization system and engage with sectors and industries that do not yet have any Certified Organizations. Furthermore, the PPC will provide the necessary support for inquiries from the organizations seeking the certification.

(iii) Promoting Voluntary Initiatives of the Private Sector

<Initiatives in FY2025>

To assist businesses in building their data governance structure, the PPC publicized previously released documents: i.e., the “Promoting PIA Efforts—Significance of PIA and Points to Note for Procedures for Conduct”, “Data Mapping Toolkit”, and the “Casebook on the Officers or Departments Responsible for Handling Personal Data.” In addition, the PPC published the research findings on the matters that businesses should take into account when appointing a data protection officer and establishing a department responsible for the

handling of personal data to drive force behind the development of data governance structures within organizations.

While the PPC engaged in steady efforts to encourage the private sector to take voluntary initiatives, further efforts are needed to improve understanding and raise awareness among businesses.

<Activity Policy for FY2026>

For voluntary initiatives on the proper handling of personal information in the private sector, it is important to build a data governance structure for ensuring the transparency and trustworthiness in the processing of personal information, etc. Therefore, in order to encourage this, the PPC will raise awareness of, and promote understanding of, such handling among businesses by the dissemination of the "Casebook on the Designated Officers or Departments Responsible for Handling Personal Data" along with others.

Further, the PPC will develop an organizational structure for the strategic planning and development of policy measures to protect personal information from a technical perspective. In addition, the PPC will study and discuss the actual situation of challenges of businesses concerning voluntary initiatives, and skill sets of personnel required for implementing a data governance structure, including the utilization of PETs (Privacy Enhancing Technologies).

2. MY NUMBER Act

(1) Monitoring and Supervision Activities

<Initiatives in FY2025>

With respect to reports on incidents involving the leakage etc. of Specific Personal Information, and inappropriate handling of Specific Personal Information discovered through ongoing monitoring and other activity, the PPC conducted investigation and analysis of each incident to identify the causes and measures to prevent recurrence, provided guidance and advice, and exercised its monitoring and supervisory authority, including seeking reports and conducting on-site inspections as necessary.

For cases in which the PPC has exercised its monitoring and supervision authority, the PPC published quarterly summaries of individual cases (together with breakdowns by cause and type of attack in cases involving unauthorized access).

The PPC also conducted on-site inspections by selecting organizations from among administrative entities, incorporated administrative agencies, or local governments based on inspection plans approved by the Commission. The PPC also examined the status of handling of Specific Personal Information and implementation of measures for managing security based on periodic reports under the MY NUMBER Act submitted by local government, etc. that hold Specific Personal Information Files.

As explained above, the PPC appropriately implemented effective and efficient

monitoring and supervision to ensure the proper handling of Specific Personal Information, etc. by businesses and administrative entities.

<Activity Policy for FY2026>

Based on various sources of information, such as reports received through the Complaint Mediation Line for MY NUMBER, media coverage, and Protection Assessment reports, the PPC will, during normal times, monitor compliance with the MY NUMBER Act. In the event that inappropriate handling or leakage of Specific Personal Information is reported or discovered through said ongoing monitoring, the PPC will conduct effective and efficient investigation and analysis of each case as well as identify the causes and examine measures to prevent recurrence. Also, with the aim of preventing similar incidents, the PPC will exercise its agile monitoring and supervision authority as necessary, by providing guidance and advice, requesting reports, and conducting on-site inspections, etc., and if needed, provide warnings and alerts based on those cases.

For cases in which the PPC has exercised its monitoring and supervision authority, the PPC will publish quarterly summaries of individual cases to support proper handling of Specific Personal Information by businesses and administrative entities. In addition, among the cases in which the PPC has exercised its monitoring and supervision authority, the PPC will disclose detailed information on particular cases where the necessity and appropriateness of disclosure are recognized. For instance, cases involving services widely utilized by the general public where there is a high likelihood of infringement on individual rights and interests, and it is deemed necessary to disclose the case for alleviating public concern or preventing further harm, or cases where there is a high degree of seriousness, such as repeated and intentional violations of laws and regulations. In such disclosures, the PPC will publish the names of the entities involved, and explain the case overview, established facts, nature of the issue, legal assessment, and administrative response.

The PPC will also conduct periodic on-site inspections to prevent the above incidents from occurring by selecting organizations from among administrative entities, incorporated administrative agencies, or other prescribed corporations based on inspection plans approved by the Commission in accordance with the provisions of the MY NUMBER Act. This will enable examination of the handling status of Specific Personal Information recorded in the retained Specific Personal Information File (excluding Process Related to an Individual Number) and the implementation status of measures for managing the security of Specific Personal Information.

As regards local governments, etc., the PPC will conduct firsthand inspections based on inspection plans approved by the Commission. Entities inspected will be selected by analyzing information useful for risk assessment, such as the existence and scale of past cases of leakage, etc., the results of previous on-site inspections, and the results of periodic reports, and prioritizing entities based on the analysis. For the selection of the entities

inspected, integration with firsthand inspection conducted under the provisions of the APPI, the efficiency of on-site visits, and regional balance, etc. will also be considered.

The PPC will also receive periodic reports from local governments, etc. that hold Specific Personal Information Files in accordance with the provisions of the MY NUMBER Act to determine the handling status of Specific Personal Information and the implementation status of measures for managing the security of personal data.

Through these inspections and research, the PPC will aim to strengthen safety management measures taken by administrative entities etc. and if inappropriate or unlawful handling of Specific Personal Information is identified through these inspections and investigations, the PPC will timely provide necessary guidance, advice, etc. in accordance with the MY NUMBER Act and the guidelines, etc. publicized by the PPC.

(2) Other Supervision Activities

<Initiatives in FY2025>

In order to maintain smooth and effective cooperation among the related ministries, government agencies, and organizations, the PPC held the annual Liaison Conference of Relevant Ministries and Agencies on Specific Personal Information Security, and shared information on the reference document titled Key Perspectives for Effective Utilization of Digital Forensics in the event of Unauthorized Access which was prepared by the Cybersecurity Liaison Meeting on the Act on the Protection of Personal Information, together with the information involving environment surrounding the leakage of personal data, thereby bringing the related organizations closer.

Meanwhile, from January 2025, Specific Personal Information has been linked among administrative entities through the third phase Information Provision Network System. Along with securing the stable operation of the system for monitoring and supervision on the Information Provision Network System, the PPC has verified, modified and improved the analytic methods built in the system on an ongoing basis, and also has been working on responding to the system update from April 2025.

Along with these efforts, in order to enhance organizational incident response capabilities and ensure the effective implementation of measures for managing security, the PPC invited local government officials to participate in initial response training assuming the occurrence of a leakage incident of personal information, including Specific Personal Information, and encouraged the local governments to rectify the issues identified through the training.

Thus, the PPC appropriately made efforts for the effective development of a cooperative framework among the relevant ministries, agencies, and organizations, the establishment of an effective and efficient monitoring and supervisory structure, and ensuring measures for managing security at local governments, so as to ensure the appropriate handling of Specific Personal Information, etc. at administrative entities.

<Activity Policy for FY2026>

The PPC will hold the Liaison Conference of Relevant Ministries and Agencies on Specific Personal Information Security with the related ministries, government agencies, and organizations. In addition, based on a cooperative framework established with these ministries, government agencies, and organizations (through memorandums of understanding concluded and shared in FY2022 (from April 1, 2022 to March 31, 2023)), the PPC will maintain close cooperation during normal times through joint efforts in education and training, public awareness activities, and necessary information sharing. In the event of incidents such as leakage caused by unauthorized access, the PPC will respond in close coordination, including, when necessary, jointly verifying facts and taking appropriate actions.

The PPC will also monitor the information sharing of Specific Personal Information using the Information Provision Network System through its monitoring and supervision system in order to ensure that inappropriate information sharing is not occurring. The PPC will also continuously verify, modify, and improve analytical methods built in the monitoring and supervision system to enable early detection and prevention of inappropriate information sharing.

Further, with respect to training for initial response to information leakage incidents to be held inviting local government officials, the PPC will make efforts to secure newly participating entities, encourage efforts in participating entities for improving their operations motivated by the training, enhance their ability for organizational response to incidents, and effectively secure the implementation of measures for managing security.

(3) Protection Assessment

<Initiatives in FY2025>

In FY2025, the PPC reviewed and approved the Full Assessment Reports received from the heads of administrative entities, in accordance with Article 28 of the MY NUMBER Act, the Rules on the Specific Personal Information Protection Assessment (Rules No. 1 of 2014 by the Specific Personal Information Protection Commission; referred to below as the "Assessment Rule"), and the Assessment Guidelines.

From the standpoint of ensuring the appropriate management of the protection assessment system by local governments, etc., the PPC provided necessary information, guidance and recommendations, including making available the common standard risk countermeasures contained in reports on Specific Personal Information Protection Assessment (referred to below as a "Protection Assessment Report").

With respect to the format revision for the Basic Assessment Report that took place in FY2023 (from April 1, 2023 to March 31, 2024), the PPC assisted assessment-implementing organizations with their transition to the new format by providing them with

detailed explanation and notices so as to prompt them to complete a sufficient review and responses before the transitional period expires at the end of FY2025.

Article 27, paragraph (2) of the MY NUMBER Act that provides: "The Specific Personal Information Protection Commission, considering the technological progress and international trends related to the protection of Personal Information, is to reexamine the Guidelines at least every three years, and, if it is found to be necessary, to change the Guidelines." As three years will have passed in April 2027 since the revision based on the previous review, the PPC reported to its 349th meeting held on January 28, 2026, on its policy to set priorities among the contents of the Protection Assessment Report, make the protection assessment procedures more efficient and speedy, and enrich the content of related materials, and commenced a review of the Assessment Guidelines with a view to achieving both the simplification of Specific Personal Information Protection Assessment and risk countermeasures.

Thus, the PPC appropriately reviewed and approved Full Assessment Reports submitted by the heads of administrative entities and steadily implemented efforts to improve the accuracy of risk assessment and review by assessment-implementing organizations by issuing notices, advice, and recommendations to heads of local governments, etc. as necessary.

<Activity Policy for FY2026>

In FY2026, the PPC will review and approve Full Assessment Reports by the heads of administrative entities submitted to the PPC, to determine whether the protection assessment has been conducted in accordance with the procedures set forth in the Assessment Guidelines and whether the measures to mitigate the described risks are appropriate in light of the objectives of the protection assessment, such as ensuring the trust of the general public. Through these efforts, the PPC will strive to prevent the occurrence of leakage incidents of Specific Personal Information, including reducing the number of cases of information leakage incidents for which a report by the head of administrative entities is required.

In order to ensure the appropriate operation of the protection assessment system by local governments, etc., the PPC will engage with assessment-implementing organizations to ensure that protection assessments are steadily conducted even for administrative affairs subject to post-assessment in emergency situations (Article 9, paragraph (2) of the Assessment Rules). In addition, before conducting on-site inspections of local governments, etc., the PPC will organize inspection perspectives based on the contents described in the Protection Assessment Reports to effectively evaluate the management status of Specific Personal Information. In addition, by encouraging revisions to the Protection Assessment Reports as necessary, the PPC aims to enhance the accuracy of risk assessment and verification by assessment-implementing organizations.

Further, with respect to the review of the Assessment Guidelines under Article 27, paragraph (2), of the MY NUMBER Act, the PPC will advance discussion so as to enable a protection assessment to be conducted more effectively and efficiently according to the associated risks, while also taking into consideration the burden on assessment-implementing organizations, based on the policy on responses reported to the PPC in FY2025 and in light of the technological progress, international developments, and the actual state of structure for protection assessment of assessment-implementing organizations.

(4) Information Linkages for Processes Specified by Prefectural/Municipal Ordinance using MY NUMBER

<Initiatives in FY2025>

In FY2025, the PPC received 2,526 notifications from a total of 1,492 local governments with respect to services covered by information linkages utilizing the Information Provision Network System satisfying the requirements under the Rules Concerning the Provision of Specific Personal Information Used under Article 19, item (ix) of the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Rules No. 5 of 2016 by the Personal Information Protection Commission). As of October 2026, the number of notifications for processes specified by Prefectural/Municipal Ordinance using MY NUMBER subject to information linkages is expected to be 13,327 from 1,509 local governments (47 prefectures and 1,462 municipalities).

In addition, in response to requests from local governments, the PPC added two example cases of processes specified by Prefectural/Municipal Ordinance using MY NUMBER subject to information linkages through the Information Provision Network System. Further, with respect to the existing two examples cases, the PPC also added Specific Personal Information that can be retrieved for statutory affairs that are similar to the above-mentioned existing cases in terms of the specific details of services.

Furthermore, the PPC exercised efforts to increase awareness of the information linkages system for processes specified by Prefectural/Municipal Ordinance using MY NUMBER, by such means as providing local governments with an explanation about the system and example cases, and holding interviews and information exchange sessions with them.

As explained above, the PPC made steady progress in increasing the use of the information linkages system for processes specified by Prefectural/Municipal Ordinance using MY NUMBER by local governments, by studying and adding example cases of processes that are eligible for information linkages and holding promotional activity to increase awareness of the system, responding to requests from local governments.

<Activity Policy for FY2026>

To promote further utilization of information linkages system for processes specified by

Prefectural/Municipal Ordinance using MY NUMBER by local governments, the PPC will widely disseminate the benefits of MY NUMBER system, such as improved convenience through the reduction of attached documents and increased efficiency and rationalization of operations within local governments through explanations about the system and visits to local governments that have not yet utilized the system.

In addition, to enable local governments to efficiently submit notifications concerning information linkages for processes specified by Prefectural/Municipal Ordinance using MY NUMBER, the PPC will ensure smooth operation of the system for processes specified by Prefectural/Municipal Ordinance using MY NUMBER and continue to promote streamlining of related procedures.

Furthermore, based on requests from local governments, the PPC will implement various measures to promote the use of information linkages for processes specified by Prefectural/Municipal Ordinance using MY NUMBER, such as considering the addition of new examples of such affairs eligible for information linkages, providing lists of frequently reported examples, and outlining notification procedures.

3. International Cooperation

(1) Developing an International Environment for the Secure and Seamless Cross-Border Transfer of Personal Information

To promote and operationalize DFFT, the PPC aims to develop an international environment that allows businesses to transfer personal information across borders securely and seamlessly, enabling them to choose the most suitable cross-border transfer scheme from multiple options according to their needs, while also facilitating the development and promotion of cross-border data transfer tools. Further, in order to address threats to DFFT and challenges related to economic security, the PPC will actively contribute to international discussions and work toward establishing global standards.

(i) Further Development of Mutual Adequacy Arrangements

<Initiatives in FY2025>

On mutual adequacy arrangements with the EU and the UK, in line with the revision of APPI to reflect the Act on the Arrangement of Related Laws for the Formation of a Digital Society (Act No. 37 of 2021), the PPC was engaged in the discussions to expand the scope of the mutual adequacy arrangements to academia and the public sector.

In terms of the arrangements between Japan and the EU, meetings were held on April 9, 2025, between Commissioner OHSHIMA Shuhei and Michael McGrath, Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection, and on September 18, 2025, between Chairperson TEZUKA Satoru and Commissioner Michael McGrath. In the joint press statement published on September 18, 2025, they "welcomed the successful conclusion of the talks on academia and research," "decided to further intensify the talks

on extending the adequacy decision to the public sector," and "concurred on taking stock of progress on this aspect of their joint work by the end of year." Following this meeting, the PPC steadily advanced the discussions on the expansion of the arrangements with the Directorate-General for Justice and Consumers and exchanged views on the progress of the discussions on the public sector.

The PPC also had talks with the UK about expanding the scope of mutual adequacy arrangements. On April 23, 2025, Commissioner OHSHIMA Shuhei and Chris Bryant, Minister of State for Data Protection and Telecoms of the Department for Science, Innovation and Technology, met and published a joint statement that both sides "welcomed the steady progress of ongoing discussions and agreed to accelerate the work with a view to delivering the expanded framework by spring 2026." In this way, the PPC successfully progressed the relevant work to the stage where both countries affirming the specific timeframe for achieving the expansion.

As explained above, while the PPC successfully made progress in the discussions on expanding the scope of mutual adequacy arrangements with the EU and the UK, further work is required to enhance the mutual adequacy framework.

<Activity Policy for FY2026>

With the scope of the mutual adequacy arrangements with the EU and the UK, the PPC will deepen its dialogues with related organizations with a view to concluding consultations on the expansion of mutual adequacy arrangements to academia and the public sector and bringing the extended arrangements into effect.

Building on the above efforts, the PPC aims to launch discussions for the establishment of new adequacy arrangements with other countries and regions that share fundamental values, so as to further develop the mutual adequacy arrangements.

(ii) Promoting the International Corporate Certification Systems

<Initiatives in FY2025>

The Global CBPR (Cross-Border Privacy Rules) Forum, established on April 21, 2022, by countries and regions sharing the same concern, including Japan, has engaged in initiatives aimed at establishing a new international corporate certification system so as to facilitate the cross-border transfer of personal data in a broader range. On June 2, 2025, the CBPR Forum launched the international corporate certification system satisfying specific personal data protection requirements, under which certification is granted by organizations recognized by the Forum. In Japan, the Japan Institute for Promotion of Digital Economy and Community, an organization recognized by the Forum, has started providing certification under this system.

As part of activity to promote the system, the PPC participated in the Global CBPR Forum Workshops hosted by the Philippines and Peru and made a presentation on how

Japan clarifies the position of this system within the domestic legal framework through the amendment of guidelines and rules.

Furthermore, by taking opportunities presented at the workshops and continuing efforts towards the promotion of the system, the Dubai International Financial Centre, which was an associate of the Forum, became a member, and Nigeria newly joined the Forum as an associate. As of March 2025, the number of businesses around the world certified by the system is 79.

Meanwhile, Japan has only four businesses that acquired the CBPR certification, with no record of any newly certified company in FY2025. In light of this situation, the PPC conducted a survey on the practices of cross-border transfer of personal data for promoting the adoption by companies while placing greater focus on the significance of the certification, in line with the cross-border transfer practices and specific needs of companies. Through this survey, the PPC acquired inputs that may help the promotion, including the targeting of companies that may adopt the certification, raising of awareness, and optimization of the certification process. Based on these findings from the survey, the PPC made a brochure for businesses to increase awareness and encourage businesses to obtain the certification through briefings for individual businesses.

As explained above, while the PPC made steady progress in promoting the international corporate certification system, further efforts, including an increase in number of certified companies, are necessary.

<Activity Policy for FY2026>

The PPC will continue to contribute to discussions on the international corporate certification systems, particularly under the Global CBPR Forum.

Further, through outreach activities such as participation and presentation at the workshop, the PPC will promote the expansion of participation by jurisdictions and businesses.

In addition, with the aim of promoting the system domestically, the PPC will enhance the effectiveness of outreach activity, such as providing individual briefings on a priority basis to businesses that may benefit from the system, based on the findings from the survey on the practices of cross-border transfer of personal data conducted in FY2025. The PPC will also create the environment to facilitate businesses to obtain the certification through such initiatives as discussions for increasing certifying bodies and further clarifying benefits from the certification.

(iii) Initiatives towards the establishment of Global Model Contractual Clauses (MCCs)

<Initiatives in FY2025>

Aiming to introduce Global MCCs in a phased manner, the PPC held exchanges of views with the Personal Data Protection Commission (PDPC) of Singapore, the National Privacy

Commission (NPC) of the Philippines, and Kementerian Komunikasi dan Digital (KOMDIGI) of Indonesia. The meeting of the Chairperson TEZUKA Satoru and Commissioner Michael McGrath also featured the topic of MCCs.

At the meetings with the PDPC of Singapore and NPC of the Philippines, the PPC exchanged opinions about initiatives towards the promotion of ASEAN Model Contractual Clauses for Cross Border Data Flows (ASEAN MCCs) and the possibility for joint research for the Japan MCCs under consideration and ASEAN MCCs and actively collected information on these. At the meeting between KOMDIGI of Indonesia and Chairperson TEZUKA Satoru, opinions on the efforts to promote the ASEAN MCCs were exchanged. Further, at the meeting with EU, positive discussion took place about the unification of MCCs used in different jurisdictions.

While the PPC successfully made progress in the efforts towards the adoption of global MCCs through engagement with authorities of different jurisdictions, it is necessary to further strengthen these efforts.

<Activity Policy for FY2026>

The PPC will pursue the establishment of Global MCCs in a phased manner in cooperation with relevant countries and regions.

First, the PPC plans to accelerate the discussion to establish Japan MCCs and publicly disclose within FY2026. Further, with a view to strengthening the cross-border interoperability the PPC will engage in an active exchange of opinions with related countries and regions and collect information. In particular, discussion is to be advanced for conducting a comparative research with prior cases like ASEAN MCCs and EU's standard contractual clauses (SCCs), with cooperation from the relevant countries and regions.

(iv) Addressing the Risks Surrounding Personal Information Protection

<Initiatives in FY2025>

The PPC aims to reflect the Declaration on Government Access to Personal Data Held by Private Sector Entities by the Organisation for Economic Co-operation and Development (OECD) to the OECD Privacy Guidelines, so that the declaration will be established as a global standard respected by non-OECD member countries as well.

In preparation for the forthcoming discussions for a review of the guidelines to be started from 2026, the PPC participated in the Data Governance and Privacy (DGP) meeting and engaged with participants in view of ensuring consistency between the declaration and the Guidelines.

The PPC also participated in the Joint Statement Initiative on E-commerce Workshop held during the period for World Trade Organization (WTO) General Council meetings and delivered a presentation on the declaration and other matters.

As introduced above, the PPC actively engaged with international stakeholders to respond to risks surrounding the personal information protection.

<Activity Policy for FY2026>

In order to address risks surrounding personal information protection, such as unlimited government access, the PPC will actively contribute to international discussions and continue its work within international frameworks, including efforts to reflect the declaration to the OECD Privacy Guideline. In addition, the PPC will explore possible forums for an exchange of opinions, such as seminars, to solidify relationship with countries and regions sharing the fundamental values.

(2) Strengthening international cooperative relationships with relevant countries and regions and developing new ones

The PPC will actively participate in the global policy-making discussions by such means as attending international conferences and engaging with organizations of related countries and regions, within the framework with like-minded countries and regions. In addition, the PPC will engage in the exchange of information on the legal systems and enforcement practices regarding personal information protection, and discuss ways to enhance cooperative relationships, thereby deepening cross-border enforcement cooperation. Furthermore, the PPC will work to strengthen bilateral and multilateral cooperative relationships, and develop new ones, to address the expansion of cross-border business activities and the growing volume of their international data transfers.

(i) Strengthening Cooperative Relationships in the Multilateral and Regional Frameworks
<Initiatives in FY2025>

The PPC actively contributed to the discussion at the 5th G7 Data Protection and Privacy Authorities (DPAs) Roundtable leading up to the adoption of the Communiqué and Statement. At the follow-up meeting after this Roundtable, the PPC gave a presentation on the enforcement case sharing format developed under its initiative. The 2026 Action Plan adopted at the meeting mentions how to leverage this format and promote this format for other forums and organizations, and this may be the first step toward the wide adoption of Japan's initiative.

At the 47th Global Privacy Assembly (GPA), the PPC presented its initiatives at the panel session, and engaged in discussions based on the initiatives and concerns of other participant countries.

The PPC also participated in the 63rd and 64th Asia Pacific Privacy Authorities (APPA) Forum, at which the PPC made a presentation on its activities and the significance of developing the interoperable cross-border data transfer environment, while also engaging in discussions based on the initiatives and concerns of other participant countries.

In addition to the abovementioned meetings, the PPC participated in various meetings, including: a follow-up meeting on the High-level roundtable on safe data flows organized by the European Commission, a meeting with Data Protection Authorities from countries with an EU adequacy decision organized by the European Data Protection Board (EDPB), the Adequate Countries Group roundtable organized by the UK Information Commissioner's Office (ICO), and the Personal Data Protection Week 2025 organized by the PDPC of Singapore. The PPC also co-sponsored the International Conference on Data Free Flow with Trust and Data Spaces held in Japan, and leveraged opportunities presented at these meetings to meet with commissioners or other equivalent senior officials from various data protection authorities.

Thus, the PPC made steady progress in intensifying cooperative relationships under global frameworks by progressing discussions towards policy-making at a global scale.

<Activity Policy for FY2026>

The PPC will consolidate the outcomes of the G7 DPAs Roundtable, including the enforcement case sharing format, as the unified voice of the G7 DPAs, and leverage this influence to promote these achievements as new agendas at other international forums, such as the GPA and APPA Forum, to expand the common perspectives.

In addition, the PPC will actively participate in conferences organized by private organizations to communicate the PPC's initiatives, and exchange views and information related to the promotion and reinforcement of international protection of personal data among data protection authorities, government organizations, businesses, researchers, and other participants in these meetings.

(ii) Strengthening bilateral and multilateral cooperative relationships and building new ones

<Initiatives in FY2025>

On December 9, 2025, the PPC worked toward the conclusion of the Memorandum of Cooperation (MOC) with the Privacy Commissioner of Canada that enables smooth information sharing by defining such matters as the scope of mutual cooperation in the enforcement of laws on personal data protection, procedures for sharing information, and handling of shared information. The PPC also exchanged views on the terms of a MOC with the NPC of the Philippines, the Personal Information Protection Commission (PIPC) of Korea, and the PDPC of Singapore.

The PPC also seized various opportunities to engage in ongoing discussions towards the execution of new MOC on the protection of personal data with other countries and regions sharing the same sense of value.

In this way, the PPC made steady progress to strengthen bilateral and multilateral cooperative relationships and develop new ones.

<Activity Policy for FY2026>

The PPC will promote collaboration with relevant authorities and organizations of related jurisdictions, and work to strengthen relationships so as to ensure that the necessary cooperation can be reliably obtained when needed in specific enforcement cases.

In addition, with a view to building effective cooperative relationships, the PPC will work toward the conclusion of new MOC with like-minded countries and regions that share fundamental values, including the Asia Pacific region and Europe.

Furthermore, the PPC will collect information necessary for the implementation of specific bilateral and multilateral cooperative arrangements, including assistance in developing legal frameworks for personal data protection, primarily focusing on the Asia Pacific region.

(3) Monitoring international developments and Public Communication

The PPC will actively monitor the latest international developments regarding personal information protection and incorporate them into its policy-making process. Furthermore, the information collected will be effectively communicated both domestically and internationally so that businesses operating across borders can utilize them, and the data protection authorities of related countries and regions as well as foreign experts can deepen their understanding.

(i) Monitoring International Developments

<Initiatives in FY2025>

In this fiscal year, the PPC developed a network with the data protection authorities and stakeholders of related countries and regions through such international forums as the G7 DPAs Roundtable and GPA. The PPC also collected information on topics of concern of other DPAs, including emerging technologies such as PETs, AI agents, and IoT (Internet of Things), children's privacy, cooperation initiatives among competent regulators, and the Digital Omnibus proposal publicized by the European Commission in November 2025.

As mentioned above, while the PPC has exercised its efforts to strengthen and build an effective network, exchanged related information and topics of concern with stakeholders, and appropriately identified international developments to inform policy-making, further efforts for information collection activity are necessary.

<Activity Policy for FY2026>

The PPC will aim to build and expand networks with the data protection authorities of relevant countries and regions, as well as private organizations for protecting personal data, to enable the appropriate collecting of meaningful information.

The PPC will exchange information on relevant developments and challenges regarding

technological innovations, such as AI, as well as social shifts. Furthermore, taking into account the latest global developments, the PPC will incorporate these insights into Japan's policy-making process.

(ii) Public Communication

<Initiatives in FY2025>

Through its website and official social networking services, the PPC effectively shared collected information, both domestically and internationally, on legal frameworks on personal data protection in other countries and the PPC's initiatives. In addition, the PPC also revisited the design of its website to improve users' access to information on international developments.

While the PPC widely shared the information that the PPC collected and made publicly available communicated to ensure it can be used by businesses operating across borders so that they can easily access such information, it is necessary to further intensify the capability to communicate information.

<Activity Policy for FY2026>

The PPC will widely share the information that the PPC collected, and make publicly available communicated to ensure it can be used by businesses operating across borders through such channels as its website and social media account, by actively updating the International Relations section of its website and increasing the number of access by users.

More specifically, the PPC will identify recent international developments and needs of businesses and then conduct research on foreign personal information protection legislation, and provide information on its results. As a part of the PPC's initiatives, in addition to its domestic communications, the PPC will make efforts to intensify its ability to share information internationally with the aim of fostering a deeper understanding among overseas data protection authorities, experts and businesses, etc.

(4) Strengthening Institutional Foundations and Human Resource Development in Area of International Cooperation

To support initiatives in the area of international cooperation, the PPC will strengthen the institutional foundation of the international affairs teams and focus on the human resource development for officials engaged in international affairs.

<Initiatives in FY2025>

Since FY2025, the PPC has dispatched its official to the Delegation of the European Union to Japan. The PPC also discussed the possibility to dispatch official to international organizations and foreign data protection authorities.

In addition, through encouraging official to take language courses and engaging young

official in practical opportunities, such as international conferences and overseas business trips, the PPC made efforts to enhance their capabilities in presentation, facilitation, and information gathering.

Thus, while the PPC engaged in discussions to strengthen its institutional foundation framework for international affairs and develop human resources, further efforts are necessary.

<Activity Policy for FY2026>

With a view to intensifying the institutional foundation framework for international affairs, the PPC will secure official to engage in international affairs in an appropriate way and consider increasing the number of officials to be dispatched to international organizations, overseas embassies and consulates, and the data protection authorities of related countries and regions.

Further, the PPC will engage in effective programs to develop the capabilities of international affairs official including capabilities to accurately present the PPC's efforts to the international community, facilitate discussions at international conferences, and gather information on the latest developments of personal information protection, including advanced technologies such as generative AI and PETs.

4. Common Matters

(1) Collaboration with Relevant Ministries and Agencies in Specific Policy Areas

<Initiatives in FY2025>

The PPC participated in the discussions on how to approach institutional frameworks for data use at the Study Group on Data Utilization Systems, which is administered by the Secretariat of the Meeting on Digital Administrative and Fiscal Reform of the Cabinet Office, as well as the Expert Panel on AI Strategy and the Council for the Promotion of Artificial Intelligence Strategy administered by the Secretariat of Science, Technology and Innovation Policy of the Cabinet Office. The PPC also provided advice to the Children and Families Agency in relation to the systems discussed at the Council on Preparation for Enactment of the Prevention of Sexual Violence against Children Act, the Study Group on Preparation for Enactment of the Prevention of Sexual Violence against Children Act, etc. Through these activities, the PPC progressed its initiatives in cooperation with various stakeholders, including ministries, agencies, and organizations, from the policy planning phase, and appropriately responded to inquiries from these authorities.

In this way, the PPC steadily made progress in collaboration with related ministries, agencies, and organizations by providing advice and responding to inquiries related to their respective policy areas.

<Activity Policy for FY2026>

The PPC will take necessary actions, including giving advice, etc. to relevant ministries and agencies regarding measures for the handling of personal information, etc. and Specific Personal Information by them to ensure the proper handling of the information, through such means as participation in the Expert Panel on AI Strategy and the Council for the Promotion of Artificial Intelligence Strategy.

(2) Response to Inquiries and Complaints from the General Public

<Initiatives in FY2025>

The PPC appropriately responded to general inquiries on the interpretation of the APPI and the personal information protection system. In addition, the PPC also operated the Inquiry Line for the Act on the Protection of Personal Information for receiving complaints regarding the handling of personal information, etc., providing mediation services, and assisting businesses in processing such complaints. The PPC also operated the Complaint Mediation Line for MY NUMBER for receiving complaints regarding the handling of Specific Personal Information, providing mediation services, and assisting businesses in processing such complaints. Through these services, the PPC appropriately responded to questions and inquiries.

The PPC also responded to questions regarding the APPI through an AI-based chatbot service (PPC Questions Chat) that is always available.

When a complaint was received regarding the handling of personal information, etc. and Specific Personal Information, the PPC helped the parties involved to settle problems themselves. If this proved difficult, the PPC provided mediation as necessary to promote appropriate and prompt resolution of the complaint, and also provided advice and information to businesses processing the complaint.

If the information obtained through these efforts indicates an obvious risk of violations of the APPI or MY NUMBER Act and involves a problem in the protection of the rights and interests of individuals, the PPC utilized such information for its various activities, including sharing the information with its monitoring and supervision sections and exercising the authority to ensure the proper handling of personal information, etc. and Specific Personal Information.

The PPC publicized quarterly reports on the details of inquiries and complaints etc. received by the Inquiry Line for the Act on the Protection of Personal Information and the Complaint Mediation Line for MY NUMBER, so as to provide citizens with detailed information on these matters, promote the proper handling of personal information, etc. and Specific Personal Information by businesses and administrative entities, and help solve problems between the parties involved.

The PPC also shared information with other organizations that handle complaints so as to improve services for the general public, etc.

As described above, the PPC appropriately responded to inquiries and complaints, provided mediation service, responded to questions through PPC Questions Chat, and publicized quarterly reports so as to ensure the smooth implementation of the APPI and the proper handling of Specific Personal Information. Further, the PPC also conducted an analysis of inquiries and complaints received, and promoted the effective use of such information for such purposes as the exercise of authority. Nevertheless, these efforts need to be further intensified, including actions required for the smooth implementation of the Amendment Act following the Triennial Review.

<Activity Policy for FY2026>

The PPC will appropriately respond to inquiries and complaints regarding the handling of personal information, etc. and Specific Personal Information received through the Inquiry Line for the Act on the Protection of Personal Information and the Complaint Mediation Line for MY NUMBER by creating example answers and training official so as to streamline the process and standardize operations.

The PPC will improve the capability of the PPC Questions Chat in such ways as adding or updating predefined questions and answers, so as to enhance the convenience and increase the usage.

When a complaint is received regarding the handling of personal information, etc. and Specific Personal Information, the PPC will help the parties involved to settle problems themselves. If this proves difficult, the PPC will provide mediation as necessary to promote appropriate and prompt resolution of the complaint.

Through these efforts, the PPC will enhance the response rate and complaint handling ratio of the Inquiry Line for the Act on the Protection of Personal Information and the Complaint Mediation Line for MY NUMBER.

The PPC will promote the use of information obtained through these efforts in various activities of the PPC, such as ensuring the smooth implementation of the proper handling of personal information, etc. and Specific Personal Information, enriching the FAQ, revising of guidelines, exercising of authorities, and taking actions for the smooth implementation of the Amendment Act following the Triennial Review.

To promote the proper handling of personal information, etc. and Specific Personal Information by businesses or administrative entities and to help solve problems between the parties involved, the PPC will make a report on the details of inquiries and complaints, etc. received by the Inquiry Line for the Act on the Protection of Personal Information and the Complaint Mediation Line for MY NUMBER on a quarterly basis.

To improve services for the general public, etc., the PPC will continue to enhance the activities of the comprehensive information center. The PPC aims to develop the capabilities of the operators to respond to inquiries and complaints appropriately and efficiently by analyzing questions and complaints. The PPC will also collaborate with other

organizations that handle complaints, for example by sharing an analysis of the complaints.

(3) Publicity and Awareness-Raising Activities

(i) Publicity and Awareness-Raising for the General Public, etc.

<Initiatives in FY2025>

The PPC made efforts to disseminate information on its activity to foster understanding and recognition of the PPC of broader citizens and other stakeholders about its activity and personal information protection systems, in a timely manner through such means as its official website and social media accounts.

The PPC also held outreach classes mainly targeting elementary and junior high school students, and at the same time launched research and study aiming at developing effective educational contents (teaching materials and manuals) keeping pace with the evolution of digitalized society, to be used for future outreach classes and enabling teachers in local areas to conduct classes on personal information protection customized for each local society.

The PPC also designated the Personal Information Reflection Week from May 26 to June 1, 2025, in line with the Privacy Awareness Week initiative of the APPA to which the PPC is a member, in an effort to inform the public of the importance of personal information.

Further, based on the Comprehensive Measures to Protect People from Fraud 2.0 (April 22, 2025, the Ministerial Meeting Concerning Measures against Crime), in collaboration with the National Police Agency, the PPC started public relations activity for broader public in February 2026 so as to promote the understanding of personal information protection in special fraud cases. The PPC also shared information on incident cases related to personal information protection with the National Consumer Affairs Center of Japan and local consumer affairs centers that receive inquiries related to personal information, so that their consultation staff may utilize it.

The PPC also produced videos and leaflets to raise public awareness of risks that may be associated with personal information, including videos featuring warnings issued by the PPC, a short video containing FAQ on the APPI, and PR characters for children, "Ko-jo bu" including "Kojonyan," and made these materials known to the public through its website and other channels.

In this way, the PPC has advanced its efforts for providing information in a timely manner to a broader range of citizens and other stakeholders, as well as for public relations and awareness raising activity in an easy-to-understand way; however, further efforts are necessary to foster understanding with respect to the PPC's activity and personal information protection system, as well as to raise public awareness of the PPC.

<Activity Policy for FY2026>

The PPC will actively disseminate information, leveraging various media, including its website and official social media accounts, to a wide range of stakeholders, including the general public so as to cultivate their understanding of the PPC's activity and personal information protection systems, through such means as actively updating its website, and increase the access. In particular, the PPC will increase its focus on information dissemination by producing more videos utilizing its official YouTube channel and increasing the number of access.

This fiscal year, the PPC will direct more efforts toward outreach classes mainly targeting elementary and junior high school students so as to improve the understanding of students, and launch a region-based pilot program initiated in FY2025 in relation to research and study aiming at developing effective educational contents (teaching materials and manuals) keeping pace with the evolution of digitalized society, to be used for future classes and enabling teachers in local areas to conduct classes on personal information protection customized for each local society.

The PPC will also hold a poster contest on personal information for students from elementary schools to high schools to guide them to take note of the importance of personal information protection and the benefits that personal information delivers.

Further, as part of countermeasures against special types of fraud, the PPC will engage in public relations activity to guide citizens to cultivate their recognition and understanding of their own personal information in cooperation with the National Police Agency. The PPC will also collaborate with other organizations, including the National Consumer Affairs Center of Japan, to share information on points of attention for the citizens to keep in mind with respect to their personal information.

This fiscal year, the PPC will designate the period from June 22 to June 28, 2026, as the Personal Information Reflection Week to engage in public relations activity for a broader range of citizens to recognize the importance of personal information.

(ii) Publicity, Awareness-Raising and Training for Businesses and Administrative Entities <Initiatives in FY2025>

The PPC organized training sessions on the proper handling of personal information, etc. and Specific Personal Information in response to requests from businesses and administrative entities etc. The PPC also developed publicity training materials specialized for educational institutions and implemented training sessions for educational boards and other education-related organizations.

Furthermore, as part of personnel exchanges, the PPC actively accepted secondees from local governments to enable their home local governments to benefit from experience and knowledge gained through their work at the PPC. In this way, while the PPC appropriately implemented efforts for the publicity, awareness-raising and training to promote the proper

handling of personal information, etc. and Specific Personal Information by businesses and administrative entities, further efforts should be exercised.

<Activity Policy for FY2026>

The PPC will conduct training on the proper handling of personal information, and the Specific Personal Information for administrative entities and incorporated administrative agencies or other prescribed corporations based on their individual requests. The PPC will also hold online seminars for the personnel at each organization. In addition, for local governments, etc., the PPC will continue to hold seminars and, in collaboration with training institutions, such as the Local Autonomy College, provide training to a wide range of personnel by utilizing various media. In addition, to support the implementation of training by local governments, etc., the PPC will update the curriculums for online training courses related to measures for managing security that are implemented jointly with the Japan Agency for Local Authority Information Systems (J-LIS), tailored to different levels of personnel. The PPC will make efforts to improve the understanding of participants in these programs.

In addition, as part of personnel exchanges, the PPC will actively accept secondees from local governments, and contribute to the strengthening of personal information protection efforts of local governments by enabling secondees' home local governments to share the knowledge and experience gained through their work at the PPC.

(4) Development and Securing of Human Resources

<Initiatives in FY2025>

The PPC seconded or dispatched officials to other ministries and agencies as well as to overseas embassies and consulates to enhance their professional knowledge and practical skills.

In order to improve the qualities and competence required for the conduct of its affairs, the PPC made efforts to foster human resources through various opportunities, by encouraging active participation in training programs offered by external specialized institutions, such as information security and language skills, in addition to conducting internal official training.

In recent years, an increasing number of personal information leakage incidents have been caused by vulnerabilities of information systems and cyberattacks. In light of this situation, in order to reinforce official's expertise skills in IT and security, the PPC encouraged its official to participate in cybersecurity training and IT literacy programs offered by specialized institutions and invited outside experts to provide study sessions for official. The PPC also reviewed its internal IT training curriculums to keep updated with the change in the social environment, focusing on practical programming exercises and at the same time adding new content related to rapidly advancing generative AI technology,

so as to improve the digital skills of officials.

Through a tutor system, the PPC utilized well-versed and experienced officials to provide one-on-one assistance to newly employed officials for familiarization with work throughout the year.

In addition, to support the retention of knowledge related to personal information protection systems and reskilling in the IT and security areas, the PPC actively encouraged official to take a qualifying test related to the APPI and the information technology engineers examination administered by the Ministry of Economy, Trade and Industry, and provided support for study materials and examination fees.

With respect to official recruitment, thanks to its intensified promotional activity by participating in recruitment events organized by the National Personnel Authority and the Cabinet Bureau of Personnel Affairs in addition to organizing its own job seminars, the PPC successfully recruited promising new graduates. Further, the PPC also utilized a selection process and experienced-hire process to hire mid-career official with specialized expertise.

These efforts have led to the development of official's expertise and the recruiting of competent official, which further intensified the PPC's personnel base. That said, against the backdrop of increasingly advanced and complex information leakage incidents, the further enhancement of specialized knowledge, particularly knowledge related to IT and security, is a critical challenge, and the PPC needs to reinforce its initiatives for human resource development in keeping with changes in the environment.

<Activity Policy for FY2026>

The PPC will develop the technical structure for the strategic advancement of planning and development of policy measures for protecting personal information.

The PPC will enhance personnel exchanges by increasing secondments to other ministries, agencies, local governments, etc., as well as dispatches to overseas embassies and consulates. Through these efforts, the PPC aims to enhance the professional knowledge and skills of its official and to cultivate personnel with broad perspectives and multifaceted viewpoints.

The PPC will leverage diverse opportunities to foster human resources, in such ways as encouraging official to actively participate in training sessions provided by external specialized institutions including information security and language programs, and recommending official receiving language courses to take English proficiency examinations administered by external organizations.

With a view to equipping official with cybersecurity response capabilities and to retaining and developing government digital technology experts, the PPC will encourage official to actively participate in cybersecurity and IT/security training programs provided by specialized institutions so as to ensure that official acquire and reinforce their expertise.

With respect to an IT training program launched in FY2019 (from April 1, 2019 to March 31, 2020) aiming to develop skills for addressing issues related to information system operations, a new training curriculum on the use of generative AI will be introduced in addition to practical programming exercises.

In addition, in order to support the retention of knowledge related to a personal information protection system and reskilling in the IT and security areas, the PPC will actively encourage official to take a qualifying test related to the APPI and the information technology engineers examination, and provide financial support for examination fees and the costs associated with the maintenance of the qualification after acquisition.

With respect to official recruiting, the PPC will actively engage in promotional activity by participating in recruitment events organized by the National Personnel Authority and the Cabinet Bureau of Personnel Affairs in addition to organizing its own job seminars, in an effort to hire excellent new graduates and mid-career official. For hiring more official well-versed in IT technology, in addition to official with legal skills, the PPC will intensify its recruiting activity in such ways as featuring technology official's career paths and interviews in its recruiting materials.

(5) Promotion of Digital Transformation (DX)

<Initiatives in FY2025>

To enhance the value-added productivity and sustainability of the PPC's operations, while responding to changes in the surrounding social environment, the PPC appointed dedicated officials in May, 2025 so as to strengthen its institutional framework for promoting digital transformation (DX). In addition to this, the PPC proceeded with discussions in detail in anticipation of introducing new technologies, including the periodic delivery of information for secretariat official to improve operations, responding to challenges related to DX, exploring new challenges, and selecting and preparing for responses to issues of priority.

In this way, the PPC intensified its institutional framework for promoting DX and advanced initiatives step-by-step.

<Activity Policy for FY2026>

In FY2026, building on the institutional framework for promoting DX established in FY2025, the PPC will securely respond to priority issues, such as streamlining and leveling the quality of public consultation and advisory services, including the upgrading of the PPC question chatbot, and improvement of services by the modification of the PPC portal site. In addition, the PPC will also explore new challenges and accurately address the priority issues, aiming to enhance value-added productivity and sustainability by envisioning an ideal state in which systems, operations, and institutional frameworks are fully optimized.