

FY2025 Commissioned Project for the Personal Information Protection Commission
Research on Promoting the Adoption of the Global Cross-Border Privacy Rules (GCBPR) System

Research Report Summary

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Japan Institute for Promotion of Digital Economy and Community
Accredited Organization for Personal Information Protection

Document Overview

- I. Outline of the Research
- II. Research and Analysis of the Actual State of Cross-Border Personal Data Transfer
- III. Recommendations on Public Relations and Outreach Activities

I. Outline of the Research

■Background and Objective

On June 2, 2025, the Global CBPR Forum officially launched GCBPR operations.

This project was carried out to contribute to the effective implementation of public relations and outreach activities to disseminate and raise awareness of GCBPR, a system that internationally certifies organizations that meet certain personal data protection requirements, by conducting research and analysis on the actual state of cross-border personal data transfers.

■Implementation Policy

In FY2024, the Ministry of Economy, Trade and Industry conducted Research for Promoting the Cross-Border Privacy Rules (CBPR) Certification System (hereinafter referred to as the “2024 Research”). Based on the findings of the 2024 Research, this study analyzed items requiring further study and those that could not be included in the 2024 Research.



II. Research and Analysis of the Actual State of Cross-Border Personal Data Transfer

■ Items that could not be included in the 2024 Research and those that should be examined in more detail were researched and analyzed with the aim of using them in materials for the efficient implementation of public relations and outreach activities to promote the adoption of GCBPR.

- 2.1. Questionnaire on Industry-Specific Needs Related to Cross-Border Transfers
- 2.2. Interviews with Companies Based on the Questionnaire in 2.1.
- 2.3. Detailed Analysis of the Strengths and Benefits of GCBPR
- 2.4. Detailed Analysis of the Corporate Certification Process and Study into Improving Its Efficiency
- 2.5. Research on the Benefits Received by Certified Companies in Cross-Border Transfers of Personal Data Among GCBPR Members
- 2.6. Mapping of the Laws and Regulations of Countries and GCBPR Program Requirements for Analysis



Key Findings of the Research

1

Actual situations associated with cross-border transfers

Many companies are unintentionally engaging in cross-border transfers using SaaS, etc. The basis for these transfers is heavily dependent on **user consent (74.3%)**.

2

Barriers to the spread of GCBPR

Awareness of the GCBPR is limited, and the primary reason for not obtaining GCBPR certification is **the lack of perceived need for it in performing the company's business. "External factors (e.g., as a bidding requirement)"** are essential for the spread of GCBPR.

3

Advantages of the system

Compared with **ISMS** and other frameworks, **GCBPR is a highly transparent international system specializing in "cross-border personal data protection."**

4

Future measures

To promote adoption of the system, streamlining the assessment process (50 questions, etc.) and expanding preferential legal treatment in foreign jurisdictions (Singapore, Dubai International Financial Centre, etc.) are needed.

2.1. Questionnaire on Industry-Specific Needs Related to Cross-Border Transfers

Purpose of the cross-border transfers

64.5%

Provision of a company's services

Attributes of cross-border transfer destinations

33.9%

**Cloud service providers
(SaaS, etc.)**

Types of information in cross-border transfers

68.3%

Employee information
(Name, address, phone number, gender, and email address)

Basis for the transfer of personal data

74.3%

Consent of the user
Transfers based on the GDPR were a small minority
Adequacy decision (25.0%)

User consent and service usage

71.6%

If the user does not provide consent, services will not be provided.

Use of information that does not require user consent

69.5%

No such practices

The greatest challenges in cross-border transfers are “understanding and addressing cross-border data protection regulations in destination jurisdictions (37.2%)” and “difficulty in aligning with the rules of various countries (31.7%).”

2.2. Interviews with companies based on the Questionnaire in 2.1

GCBPR awareness and obstacles in obtaining it

Why has your company not obtained it?

-  We do not feel the need for it in performing the company's business (most commonly expressed opinion: a perception that direct interaction with overseas parties is limited)
-  Lack of awareness and understanding of the system
-  The advantages and cost effectiveness are unclear.

What would motivate your company to obtain it?

-  External factors: Customer requests, business transaction requirements, eligibility requirement to participate in bidding for administrative commissioned projects, and other business necessities
-  Introduction of group certification: To reduce companies' operational and maintenance costs (almost all companies express this desire)
-  Alignment with existing certifications: Reduces additional burden by eliminating overlap with ISMS, etc.

2.3. Detailed Analysis of the Strengths and Benefits of GCBPR

Holds a significant advantage in securing international trust specific to cross-border data protection

	GCBPR	ISMS / PIMS	PrivacyMark
Purpose/specialized domain	Specialized in protecting cross-border personal data Participating governments are involved	Management system for the entire organization Not specialized in cross-border data	Management system for the entire organization Not specialized in cross-border data
International cooperation	Cross-border enforcement cooperation is made possible through Global CAPE	Not applicable	Not applicable
Certification period	One year (reassessment) Monitoring (6 months after application)	Three years (renewal assessment) Surveillance (once a year)	Two years (renewal assessment) The assessment does not cover the entire scope.
Certification costs	Individual-estimate basis Estimate varies depending on business activities, number of transfer destinations, etc.	Individual-estimate basis Variations depending on the scope and number of assessors	Fixed rate Company size, new application or renewal

Program requirements
(alignment rate)

- GCBPR has a high rate of alignment with PrivacyMark and PIMS
- Areas with lower alignment rates are information security and contracted party management
- ISMS has more detailed control measures in the area of information security

2.4. Detailed Analysis of the Corporate Certification Process and Study into Improving Its Efficiency

Actual situation of the corporate certification (Accountability Agent) process

Workload	Period	Number of assessors	Costs
1.3–132 man-days	2.25–6 months	1–4 persons	US\$3,600–\$65,445

The 50-question conformity assessment

is a critical step in the assessment process

Direction for improving efficiency



Digitalization: Centralized information management and reduction of manual work by introducing an online platform (already implemented by some overseas AA)

Alignment with existing certifications: Reduce the burden on companies that have obtained ISMS, etc. in processing and formatting of the documents to be submitted (considering the introduction of differential review)

Reducing the operational burden: A streamlined model that ensures quality while considering the short one-year renewal period is designed.

2.5. Research on the Benefits Received by Certified Companies in Cross-Border Transfers of Personal Data Among GCBPR Members

Jurisdictions that recognize certification as appropriate safeguards

Singapore and the Dubai International Financial Centre *Including Japan

GCBPR certification is stipulated as an equivalent measure and a certification mechanism for cross-border transfers under laws and regulations, and direct benefits can be received. In other jurisdictions, GCBPR is aligned with existing data protection frameworks, but it cannot be considered an official preferential treatment.

Jurisdictions where the concept of equivalent measure exists but certification is not explicitly recognized.

Australia and the Republic of Korea

Transfers are permitted if cross-border transfer destinations have the equivalent level of protection of personal information protection as their jurisdiction.

2.6. Mapping Analysis of National Laws Against GCBPR Program Requirements

The laws and regulations of Vietnam, India, and Indonesia can be considered generally consistent with GCBPR program requirements

Vietnam (PDPD/PDPL)

- The notification requirements are well developed.
- Detailed provisions are not well defined.
- The notification obligation regarding completeness and correction is insufficient.
- Security measures are broadly defined and strong.
- Liability provisions are limited.

India (DPDP Act)

- The notification specifies the purpose, data type, and rights.
- Details, including notification obligation regarding the collection method, are insufficient.
- Some use cases have less stringent requirements because the concept of “compatible purposes” is lacking.
- Security measures, audits, etc. are mandatory only for SDF(Significant Data Fiduciaries)
- Rights of access and correction exist, but few specific procedures are prescribed.
- The handling of complaints is relatively clearly defined

Indonesia (PDP Law)

- Notification items are set together with consent requirements; therefore, they cannot be considered equivalent.
- The right regarding completeness and correction is clear.
- Security measures are broadly defined and strong.
- The physical security requirements are not specified.
- The right of access is, in principle, free of charge but with exceptions.
- The complaint handling procedure only goes so far as defining complaints as a right of the data subject.

III. Recommendations on Public Relations and Outreach Activities

Objectives

The survey questionnaire and interviews in Chapter II clarified the current situation in which the GCBPR is not well understood or widely recognized and identified the types of information required by business operators and the priority target audience. Details are described later in Section 3 (Points to Note During Public Relations and Outreach Activities).

Based on the findings of the research, this chapter identifies effective public relations activities to disseminate GCBPR and increase the number of jurisdictions and companies participating, and also suggests useful indicators.



Issues and Measures for Improvement



Websites



Seminars and symposia



Brochures and leaflets

Issues

- **Insufficient explanation of the system**
All entities (the Forum, government agencies, and JIPDEC) are considered **insufficient in presenting a detailed explanation of the GCBPR system and its merits.**
- **Information is difficult to understand.**
Information design that is difficult for users to understand is raised as a common issue, such as text-based content that is difficult to understand and lack of a systematic information structure.

- The information is buried deep within the hierarchical structure, making it difficult to find.
- Seminars are one-off and lack continuity.
- Few meetings are held outside large cities, making it difficult to participate.
- The content is mainly text-based with a lecture-style format, thus, difficult to understand.

- At present, nearly nonexistent
- Materials with content to support business practices, such as case studies, benefits, and cost-effectiveness, are insufficient.

Improvements

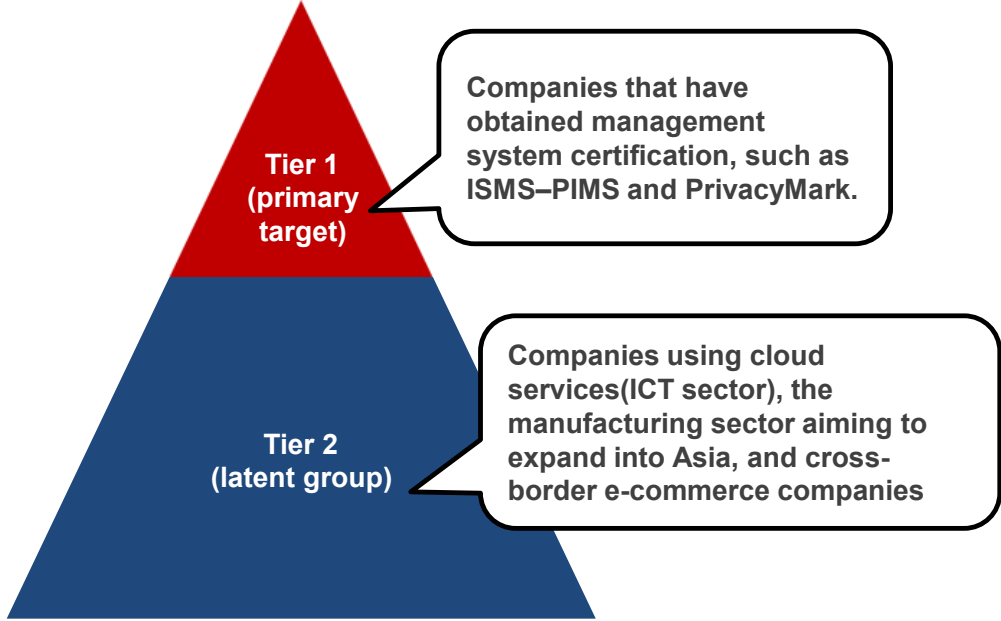
- A GCBPR banner is displayed on the top page.
- Enhancing the appeal of advantages and case studies from the unique viewpoint of ministries, agencies, and assessment bodies
- Make it clear that a company is subject to GCBPR regardless of its size or business category.
- Reinforcement of guidance through social media, industry media, and advertising
- Boost visual content, such as drawings and videos

- Hold regional events and archive the events online.
- Expand communication through social media and YouTube.
- Introduction of workshops for beginners
- Strengthen follow-up by updating FAQs and encouraging the use of consultation services.

- A prototype of a one-sheet or 3-fold brochure that is illustration-centered is created.
- Case studies, certification process, maintenance framework, and cost effectiveness are included
- The printed materials are distributed to government agencies and local governments for wide dissemination.

Priority Targets

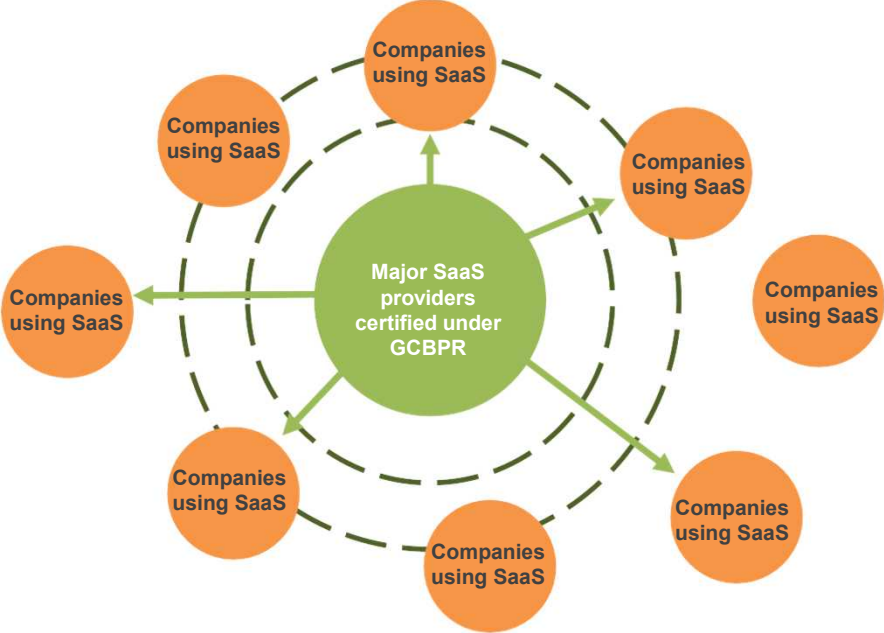
Target pyramid



Approach for “unconscious cross-border transfers”

Raise awareness of the fact that cloud usage constitutes a de facto cross-border transfer and promote an understanding of the urgency of addressing this issue.

Spillover effects from the SaaS providers



Use of certified companies as ambassadors

The purpose is to encourage awareness of cross-border transfers to users through services and increase recognition on a broad scale.

Three recommendations for promoting the future adoption of GCBPR

1



Create external factors (incentives)

Break away from simply emphasizing “reliability.” Design business-linked incentives, such as making it a bidding requirement by government agencies and encouraging major corporations to request it across supply chains.

2



Dramatically reducing assessment and operational costs

Introduce online platforms, collaborate with existing third-party certifications such as ISMS, and introduce differential review to eliminate double burden on companies. Implement group certification promptly.

3



Enhance international visibility of legal benefits

In addition to bringing attention to the risk of unintentional cross-border transfers (such as with SaaS use), strengthening international engagement so that GCBPR functions as a practical compliance pathway and a legally recognized route in addressing data protection laws in each country (particularly in the Asian region) is necessary.