

Global Strategy of the Personal Information Protection Commission

26 March 2025

1. Background

As the importance of safe and smooth cross-border transfer of data, including personal information, has further increased with the development of the digital society, the Government of Japan is now promoting “Data Free Flow with Trust” (DFFT). In particular, the Personal Information Protection Commission of Japan (PPC Japan) has played a leading role in the promotion and operationalization of DFFT in the field of personal information protection and privacy in Japan.

The PPC Japan hosted “the 62nd Asia Pacific Privacy Authorities (APPA) Forum” and related side-events in November 2024, leading discussions with multi-stakeholders including Data Protection Authorities (DPA(s)) from like-minded countries and regions, as well as businesses and experts, thereby deepening efforts towards promoting DFFT. At the forum, discussions and information exchanges were held on the latest trends in the legal frameworks and enforcement activities related to personal information protection, yielding outcomes that contributed to the deepening of dialogue on personal information protection in the Asia-Pacific region and the strengthening of international cooperation.

Furthermore, the PPC Japan contributed to the comparative analysis of existing certification systems at “the 4th G7 Data Protection and Privacy Authorities Roundtable” in 2024. In alignment with this movement, the PPC Japan also engaged in further discussions on DFFT at the Global Privacy Assembly (GPA) in October of the same year, playing an active role in the adoption of the resolution on “Resolution on Data Free Flow with Trust and an effective regulation of global data flows.” These efforts significantly contributed to the advancement of the concept of DFFT and its operationalization in the international arena.

The PPC Japan will continue its commitment not to adopt an exclusive approach but to aim at realizing an international environment in which different personal information protection systems and international frameworks can be interoperable, while respecting the diversity of them and taking into account the needs of businesses.

Based on the above, the PPC Japan's Global Strategy for FY2025 shall be defined as follows.

2. Developing an international environment for the safe and smooth cross-border transfer of personal information (Pillar 1)

The PPC Japan will support businesses for their transfer of personal information across borders in a safe and smooth manner for the purpose of promoting and operationalizing DFFT. In addition, the PPC Japan will promote developing an international environment that allows businesses to choose the cross-border transfer scheme suitable for their own needs and other factors from multiple options. At the same time, the PPC Japan will aim to develop tools for cross-border data transfer on a global scale and work towards establishing global standards.

(1) Further developing the mutual adequacy arrangements

The PPC Japan will continue to work toward expanding the scope or the number of countries and regions covered by the mutual adequacy arrangements, which facilitate smooth personal data transfers with countries and regions that have established a personal information protection system recognized to have substantially equivalent standards to that in Japan, as a top priority issue, inter alia, by:

- Aiming for an early conclusion of consultations on expanding the scope of the mutual adequacy arrangement with the EU and the UK to the academia and the public sector, in line with the 2021 amendment of the Act on the Protection of Personal Information (APPI) and aiming for its entry into force by FY2025.
- Furthermore, initiating discussions about a new mutual adequacy arrangement with like-minded countries and regions having shared fundamental values with Japan with a view to further developing the mutual adequacy arrangement.

(2) Promoting the international corporate certification systems

The PPC Japan will lead a discussion on the international corporate certification systems, particularly under the Global Cross-Border Privacy Rules (CBPR) Forum, and actively work to encourage stakeholders' participation in the Forum, inter alia by:

- Leading a discussion on enhancing program requirements and other issues of the Global CBPR System.
- Working on promoting the expansion of participation by jurisdictions and businesses through outreach activities such as participating in and speaking at workshops.
- Creating an environment that facilitates obtaining the certification of the System by

businesses, including through hosting symposiums, conducting corporate surveys, recognizing new Accountability Agents, and clarifying the benefits of the System for certified companies, thus promoting the uptake of the System domestically.

(3) Introducing the global model contractual clauses

The PPC Japan will aim to introduce global model contractual clauses (MCCs) in stages, while collaborating with like-minded countries and regions. Initially, the PPC Japan will focus on conducting research on needs, best practices, and other relevant examples on a global scale.

- Jointly researching existing MCCs with like-minded countries and regions having shared fundamental values with Japan.
- Actively contributing to multilateral and regional frameworks such as the G7 and GPA by collecting and disseminating information related to these efforts.

(4) Addressing the risks surrounding personal information protection

The PPC Japan will continue its efforts to address the risks surrounding personal information protection, such as unlimited government access, by contributing to international frameworks, including the reflection of these risks in the OECD Privacy Guidelines.

- The PPC Japan will work towards disseminating the “Declaration on Government Access to Personal Data Held by Private Sector Entities,” adopted by OECD member countries, to non-member countries and regions.

3. Strengthening and building international cooperative relationships with like-minded countries and regions (Pillar 2)

The PPC Japan will participate in the global policy-making discussions within the framework with like-minded countries and regions. In addition, the PPC Japan will engage in the exchange of information on the legal system and enforcement practices regarding personal information protection, as well as discussing ways to enhance cooperative relationships, thereby enhancing cross-border enforcement cooperation. Furthermore, the PPC Japan will work towards strengthening and building bilateral and multilateral cooperative relationships to address the development of cross-border business activities and the increase of data transfers by businesses.

(1) Strengthening cooperative relationships in the multilateral and regional frameworks

- Collating the outcomes of the Roundtable as the unified voice of the G7 DPAs, and, spreading that voice toward other international fora such as the GPA and APPA Forum

by leveraging of the G7's influence, as well as recommending them to endorse or incorporate that voice in new resolutions and expanding the common perspectives with that voice among them.

- In addition to the international frameworks mentioned above, actively participating in other fora including conferences organized by the private sector and continuing to disseminate information on the PPC Japan's initiatives through various opportunities, while engaging in exchanges of views and information on the international promotion and enhancement of the personal data protection with DPAs, government bodies, businesses and researchers from participating jurisdictions.

(2) Strengthening and building bilateral and multilateral cooperative relationships

- Promoting collaboration with relevant authorities and working to further strengthen cooperative relationships, thereby ensuring that necessary support is obtained when needed for individual enforcement cases.
- Recognizing the Memorandum of Cooperation (MOC) on personal information protection between the PPC Japan and the UK ICO, which was concluded in October 2023, as a meaningful precedent, working on signing new MOCs with like-minded countries and regions having shared fundamental values with Japan, with the aim of expanding the group of MOC signatories.
- Engaging in specific bilateral and multilateral cooperation, including technical assistance such as supporting the development of personal information protection legislation, with a priority given to the Asia-Pacific region.

4. Grasping international trends and disseminating information (Pillar 3)

The PPC Japan will actively grasp the latest international trends regarding personal information protection and incorporate this into its policy-making process. Furthermore, the information collected will be effectively disseminated both domestically and internationally to ensure that businesses operating across borders can utilize it.

(1) Grasping international trends

- The PPC Japan aims to build and develop networks with DPAs, private organizations, and experts in like-minded countries and regions.
- The PPC Japan will exchange relevant information and raise awareness on addressing issues such as technological innovations and social challenges. By taking into account the latest global trends, this will be utilized in our country's policy-making process.

(2) Information dissemination

- The information collected by the PPC Japan will be widely disseminated to ensure it can be used by businesses operating internationally.
- In particular, by understanding the current international situation and the needs of businesses, the PPC Japan will conduct research on foreign personal information protection legislation and provide information on its findings.
- The PPC Japan will make efforts to increase understanding of its initiatives among DPAs, experts, and businesses in like-minded countries and regions, using platforms such as the PPC Japan's website to facilitate international information dissemination.

5. Strengthening the foundation of the institutional arrangement of the international affairs teams and training the skills of officials engaged in the international affairs

To implement the aforementioned global strategy, the PPC Japan will strengthen the foundation of the international affairs teams and focus on developing the following capabilities of officials engaged in international affairs:

(1) Strengthening the foundation of the institutional arrangement of the international affairs teams

- Continuing to secure sufficient human resources to properly carry out tasks related to emerging technologies, cross-border enforcement cooperation, and other relevant issues.
- Considering the secondment of officials to DPAs in like-minded countries and regions and international organizations, in addition to those already deployed at international organization and Japanese diplomatic mission, in order to facilitate direct communication and information gathering from foreign DPAs and international organizations.

(2) Human resource development for officials engaged in international affairs

- Enhancing presentation skills to correctly convey the PPC Japan's policies at various international fora.
- Enhancing facilitation skills to lead discussions at international fora.
- Strengthening information-gathering skills on the latest trends in personal information protection, including emerging technologies such as Privacy Enhancing Technologies (PETs) and generative AI.