

(Translation)

Outline of the System Reform Concerning the Utilization of Personal Data

Strategic Headquarters for the Promotion of an Advanced
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Part 1. Introduction

This outline indicates the government's direction in connection with the specific measures to be taken by the amendments of laws and regulations related to personal information protection, based on further reviews of the "System Review Policy Relating to the Utilization of Personal Data", which was approved by the Strategic Headquarters for the Promotion of an Advanced Information and Telecommunications Network Society (IT Strategic Headquarters) on December 20, 2013.

The outline will be subject to the public comment procedure to hear the citizens' opinions. In consideration of such opinions, the Cabinet Secretariat will play a central role in the adjustment of issues among all government ministries and amend the direction as needed in order to finalize details of system design to prepare the draft bill.

Part 2. Basic Idea

I. Purpose of System Reform

1. Background

More than ten years have passed since the enactment of the Act on the Protection of Personal Information¹ (hereinafter, "Current Act"). During this period, information and communications technology (hereinafter, "ICT") has dramatically advanced to enable the collection and analysis of a large amount of diversified data, so-called "Big Data". It is expected to significantly contribute to the ongoing creation of innovation in Japan through the emergence of new industries and services, and the resolution of various issues that challenge this country.

In particular, although difficult at the time of the enacting of Current Act, the use of advanced ICT has made it possible to utilize personal data including the behaviors and states of individuals, which has a high usage value, not only for the benefit of individuals, but also for the public interests.

At the same time, as the "Gray Zone" where it is unclear as to whether the free use of information is allowed has emerged and expanded, the extent to how far personal data should be protected and the rules that govern business operators are becoming more ambiguous.

¹ Act on the Protection of Personal Information (Act No.57 of 2003)

On the other hand, while the concepts of personal information and privacy have become broadly recognized and accepted in society since the enactment of Current Act, there is a growing concern among consumers of the possibility of the advanced ICT abusing personal information. As the desire increases for personal information to be handled with more caution, a system which can appropriately define and handle personal information is needed to assure consumers their information is securely protected.

In the circumstances, the emergence and expansion of the Gray Zone makes business operators hesitant to use personal information as they see risk of facing social criticism relating to privacy even when they are not violating individuals' rights or interests. Effectively, the Gray Zone has become "Barriers to Utilization" of personal data.

Considering this situation, the Government's growth strategy lists the data utilization as a mean of reviving the industries and notably, breaking down the "Barriers to Utilization" of personal data of high usage value is critical. While the practice to prevent the violation of individuals' rights and interests and to ensure the protection of personal data and privacy should continue, it is desired to create an environment where data use enables both the creation of new industries and services, and the security and safety of citizens.

Furthermore, amid the ever-increasing globalization of corporate activities, advancement in ICT such as cloud service is making cross-border information distribution extremely easy. In order to adapt to such changes, the OECD (the Organization for Economic Co-operation and Development), of which Japan is a member nation, amended its Privacy Guidelines² in July 2013.

In the US, in February 2012, the Consumer Privacy Bill of Rights³ was released. This was followed by a legislative resolution of the European Parliament resolution to pass the draft General Data Protection Regulation⁴ in March 2014, which is

² OECD, the Recommendations of the OECD Council concerning Guidelines governing the Protection of Privacy and Transborder Flows of Personal Data (2013)

³ White House, Consumer Data Privacy in a Networked World: A Framework for Protecting Privacy and Promoting Innovation in the Global Digital Economy (2012)

⁴ European Parliament, European Parliament legislative resolution of 12 March 2014 on the proposal for a regulation of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) (2014)

subject to continuing review. Accordingly, the discussions and development of laws for the protection of personal data and privacy are globally taking place.

Amid this background, in order to support the business environment where data come to Japan from all over the world, it is necessary to make sure our system works in international alignment, addressing both the use and distribution of data, and the protection of privacy in other countries.

2. Issues

The various issues that have emerged from this background can be classified and arranged in the following manner.

(1) Breaking down the “Barriers to Utilization”

(i) Working with the Gray Zone

As information is increasingly diversified and ICT advances, the “Barriers to Utilization” of personal data is caused by the “Gray Zone” with the following factors:

- Vagueness of legal interpretation of the scope of “personal information” and
- Vagueness of the rules that govern business operators regarding the scope of protection and its handling where the personal data does not identify individuals as is but has a high probability of identifying individuals with some process, which then can violate individuals’ rights and interests.

Those factors need to be resolved by analyzing the current status of data possession by business operators and issues they face regarding data use. It is also critical, as a detonator to break down the “Barriers to Utilization”, to create a system that allows business operators to effectively utilize the personal data that they possess.

(ii) Preventing the violation of individuals’ rights and interests

In order to promote the use of personal data, it is important to create the environment where consumers feel assured that data they provide are handled appropriately without worrying about the data may be utilized for other than the intended purpose. Therefore, it is necessary to prevent acts by business operators that may cause violations of individuals’ rights and interests.

(2) Responding to changes with agility

Because types of information, methods of utilization, and individuals' ideas about privacy change over time, it is difficult to eliminate the gray zone and other possibilities of violating individuals' rights and interests only by laws of which enactment and revisions require strict procedures. In order to respond to such changes with agility, it is necessary to properly separate the scope to be stipulated by laws from the scope to be covered by ministerial ordinances, regulations and guidelines, and to build a system that supports and encourages private organizations' own initiatives to respond to changes in a timely manner.

(3) Ensuring the system enforcement

To ensure business operators' compliance with the rules, and obtain the consumers' trust, it is necessary to enforce the system appropriately by the fair and independent enforcing body. In addition, for making the above-mentioned private organizations' own initiatives to work effectively, it is necessary to establish a public organization that grants authority to the private organizations. Furthermore, the public organization is expected to collaborate with the contact point for complaints while promoting education and awareness including provisions of legal guidelines.

(4) Making the system in international alignment

As business activities are globalized, needs arise to share and transfer personal data between companies in Japan and companies in other countries. To enable such sharing and transfer of personal data, it is necessary to make sure trusted system is built in international alignment with discussions on personal information protection and privacy and development of relevant laws in other countries.

II. Basic Framework of the System Reform

This system reform is designed to promote the utilization of personal data and to implement legal measures to resolve the aforementioned issues. The fundamental framework is set forth as below:

1. Introducing a framework that enables data utilization without individual's consent

Personal data utilization is expected to create innovations and new businesses through cross-industrial utilization of a large amount of diversified data. However,

the current framework requires the individual's consent before the data can be used for other than the intended purpose or the data can be provided to third parties, which places a huge burden on business operators and is one of the "Barriers to Utilization". To address this, with the understanding of the intent of Current Act that individual's consent is required to prevent the violation of the individual's rights and interests, a new framework which, under the newly created rules, enables the provision of personal data to a third party without the individual's consent will be introduced to augment Current Act. Specifically, rules will be established for processing personal data into the "Data in which the Identifiability of Individuals is Reduced" and substituting the process for obtaining the consent from individuals. For the data such as medical information which requires cautious handling but has a great possibility to contribute to individual's benefits and to the public interests, we promote data utilization with appropriate protection to avoid chilling effect.

2. Establishing basic framework of the system and leveraging private organizations' own initiatives that supplement it

Because the content of the gray zone, and the possibility and nature of violation of individuals' rights and interests change over time driven by multiple factors including ICT advancements and individual perspectives evolves, to maintain agility in responding to such changes, only the broad outlines shall be set forth by the laws while the specific implementation details shall be covered by ministerial ordinances, regulations, and guidelines. In addition, private organizations' self-regulations shall be leveraged. The following items will be included in the system reform:

- Regulations shall be created under which the scope of "personal data" is clearly defined so that business operators will not hesitate to use personal data while individual's rights and interests are not violated.
- The system shall be capable of adapting to technological advancements quickly.
- To balance the promotion of personal data utilization and the protection of personal information and privacy, a framework shall be established to have Third Party Organization to ensure the efficacy of implementation through authorization, leveraging the concept of multi-stakeholder process⁵ involving consumers and other relevant parties for cases such as private sectors formulate specific operating rules that are tailored for specific industries (e.g., a method to process personal data into data in which the identifiability of

⁵ To implement an open process to create rules, etc., through the participation in of stakeholders, including the government, business operators, consumers, academics and experts.

individuals is reduced), and self-regulatory industry-specific rules are established for matters that are not yet regulated by law (e.g., countermeasures against possible abuse resulting from data analysis).

3. Ensuring effective enforcement of system through the establishment of Third Party Organization structure

For promoting personal data utilization, an independent third party organization (“Third Party Organization”) structure shall be established to effectively support enforcement of laws and private organizations’ self-regulations. The following items will be included in the system reform:

- Third Party Organization shall be established to ensure the effective execution of laws and private organizations’ self-regulations, while ensuring international alignment.
- Regarding Third Party Organization, a commission shall be established to promote the personal data use as well as protection, maintaining the balance between them by reorganizing the Specific Personal Information Protection Commission stipulated in the Number Act⁶.
- Third Party Organization shall have the function and authority to conduct on-site inspections in addition to the function and authority the relevant Minister currently has for business operators handling personal information.
The organization shall also certify private organizations’ self-regulations, and certify and supervise private organizations that authorizes compliance with the privacy protection standards accepted by the other country for cross-border transfer of personal data.
- Rules shall be set forth for the right to claim regarding individual’ right to request disclosure of personal information under Current Act

Furthermore, upon the system reform, we shall be aspired to make the system most appropriate for Japan as well as in international alignment with other countries’ systems and the current international situation to make sure not to inhibit cross-border information distribution, and at the same time, protection measures for outbound information transfer and application of domestic laws to foreign business operators shall take place with consideration of the cross-border information distribution reality.

⁶ Act on the Use of Numbers to Identify a Particular Individual in Administrative Procedures (Act No. 27 of 2013)

III. Schedule going forward

While the timing of enforcement of the amended law subject to the system design as well as the timing of the bill enactment, the schedule is expected as follows:

- (1) The bill to the Diet shall be submitted as early as possible after January 2015.
- (2) Enforcement of the law shall be in effect as soon as the enactment of the amendment to the law, except for the part requiring notice and preparation, and Third Party Organization shall be set up as promptly as possible to commence operations.
- (3) The remaining part shall be implemented as quickly as possible.

Furthermore, it is necessary to increase awareness of Third Party Organization and new system, when implementing the reform and leverage the private sector undertakings under the existing system to ensure smooth transition to the new system.

Part 3 System design

I. Purpose and fundamental principle

While promoting the personal data utilization is paramount for the benefit of society as a whole as well as for individuals' merits, from the privacy protection perspective, the proper handling of personal data shall be no less important as it has been to date. To that end, the current system shall be reviewed in accordance with the advancements of ICT for the purpose of governing the appropriate handling of personal data to balance its protection and utilization.

II. Introducing a framework to promote the personal data utilization

1. Handling of data in which the identifiability of individuals has been reduced

Under Current Act, the individual's consent is required before personal data can be provided to a third party or used for other than the intended purposes, with certain exceptions. Regarding such provision of personal data to a third party or use other than the intended purposes, in addition to those cases where such provision or use is consented by the individual, measures shall be introduced to enable smooth information utilization without obtaining individual's consent when personal data has been processed into the data in which the identifiability of individuals has been reduced. This shall be made possible by defining the appropriate handling procedure for such data (e.g. prohibiting individual identification), taking the possibility of individuals being identified and the risk of violating individuals' rights and interests into considerations.

We shall not specify any particular ways to process data into the data in which the

identifiability of individuals has been reduced, considering the usefulness and diversity of data, but allow business operators to find the best way to process for their business characteristics. Furthermore, Third Party Organization shall authorize self-regulations on data processing methods formulated by private organizations. In addition, best practices shall be shared for the appropriate processing method.

2. Handling of personal data owned by governmental and administrative agencies and independent administrative institutions

For personal data owned by governmental and administrative agencies and independent administrative institutions, research and study shall take place based on the data characteristics to determine the scope and categorizations of information to be utilized, and its proper handling by consulting with the organizations that own personal information and other interested parties. For this system reform, the central government shall examine the need to provide relevant information to local government bodies.

III. Basic framework of system and the utilization of private organizations' own initiatives that supplement it

1. Rules concerning the basic framework of the system

(1) Clarification of data to be protected and its handling

It has been pointed out that barriers to data utilization exist because it is not clear for business operators whether or not certain types of personal data are classified as personal information which shall be protected under Current Act.

To address the issue, rules shall be created, in consideration of the protection of individuals' rights and interests and the nature of business activities, to clearly specify what types of data related to individuals' physical characteristics such as finger print recognition data and facial recognition data, etc., to be protected.

In addition, the scope of protected data shall be reviewed in consideration of the organization of business operators, the nature of activities, and the state of society including the advancements in ICT and to ensure quick decision making in accordance with technological advancements and emergence of new personal data needs.

As for applicability to the definition of "Personal Data" to be protected, Third Party Organization shall make efforts to clarify the interpretation of the definition and to

provide timely response to preliminary inquiries for each specific cases.

(2) Sensitive Information

Data that may cause social discrimination, such as race, faith, social class and criminal records, etc., shall be defined as “Sensitive Information” and cautious and prudent handling of such data should be considered including prohibition in principle of handling of personal data containing Sensitive Information.

However, in consideration of the underlying purpose of Current Act and the actual use case of personal data containing Sensitive Information, handling of such information shall be allowed with the individual’s consent and exemptions shall be stipulated for cases required by law, or necessary for the protection of the life, body, or property of a person.

(3) Reviewing personal information handling

(i) Necessary measures shall be taken to define the procedures to be followed by the business operators handling personal information in the cases where individuals can be identified without the persons’ knowledge, as a result of information being collected, matched and analyzed.

(ii) In order to create an environment where various kinds of value in personal data can be realized in a timely and flexible manner, the procedure to change the use purpose shall be reviewed while making sure the data will not be used for other than the purpose intended by the individual.

For example, when a business operator wishes to change the data use purpose, the process shall be designed so that the individual will get notified of and can respond to the change request. If he/she does not desire the data to be used for the new purpose, he/she can deny the change request. This will enable the personal data of those who do not deny the request to be used for the new purpose. For determining specific measures for this, more study shall be necessary with consideration of information characteristics. Furthermore, effective rules shall be introduced to prevent substantial usage change from the original purpose without the full awareness of the individual.

(iii) With regard to the Opt-out rules⁷ for the personal data provision to third parties, we

⁷ At the request of individual, the provision of personal data that can identify such person to a third party will be terminated (Please refer to Article 23 (2) of Current Act.)

are aware of some implementation issues, and shall strive to further refine implementation to reflect on the intention of Current Act.

Also, appropriate measures shall be implemented for the individual who is identifiable from the personal data to be able to easily confirm the personal data handling operator using the opt-out rules. In addition to the requirements under Current Act, the operator using the opt-out rules to transfer the data to a third party must report the items⁸ to be notified to individuals as required by law to Third Party Organization, which then publicize the items.

For this, while considering the impact on business operators that have been properly handling personal data, the scope and the minimum procedural requirements shall be defined.

- (iv) There is some confusion under Current Act as to the interpretation of joint use⁹ of personal data by business operators handling personal information. The correct implementation shall be further enforced to support the intent of Current Act, which is that joint use is allowed only when the multiple entities sharing the personal data can be perceived as one operator by the individual.
- (v) Recognizing that diverse data is utilized in many forms, consent obtaining process shall be improved to be more user-friendly, by leveraging self-regulatory rules in which the consumer-participating multi-stakeholder process is applied.
- (vi) While no overall retention period shall be regulated, the rules to publish the retention periods of personal data shall be considered from the perspective of ensuring transparency of the data owned by business operators.

2. Establishment of a framework for creation and observation of self-regulations initiated by private organizations

In order to promote both the utilization of personal data and the protection of personal information and privacy, a framework of self-regulations initiated by private-

⁸ Items stipulated in Article 23 (2) of Current Act.

⁹ The cases in which personal data is used jointly between specific individuals or entities and in which this fact, the items of the personal data used jointly, the scope of the joint users, the purpose for which the personal data is used by them, and the name of the individual or business operator responsible for the management of the personal data is, in advance, notified to the person or put in a readily accessible condition for the person shall be exempted from the rules concerning delivery of personal data to third parties. (Please refer to Article 23 (4) - (3) of Current Act.)

sector shall be established based on the multi-stakeholder process concept.

The private organizations designated to create self-regulations shall create implementation rules for law and for the items not stipulated by law, in accordance with the advancements of ICT, for the personal information and privacy protection, towards the issues requiring quick responses, in consideration of the nature of the information, specific characteristics for each industries and subject areas such as the market structure as well as the opinions of interested parties, and shall be able to take necessary measures against the entities subject to the rules. Third Party Organization shall certify the said rules and authorize the private organization, etc.

Furthermore, involvement of each Minister shall be considered based on the arrangement of the relationship between the Minister and Third Party Organization.

3. Framework for cross-border personal data transfer initiated by private organizations

In order to facilitate the smooth transfer of personal data across national borders, a framework shall be put in place whereby the private organizations authorized by Third Party Organization shall review compliance with the privacy protection standard accepted by counterparty country and then certify business operators wishing to engage in cross border data transfer.

The private organization conducting the certification shall be supervised by Third Party Organization.

Furthermore, involvement of each Minister shall be considered based on the arrangement of the relationship between the Minister and Third Party Organization.

IV. Ensuring effective enforcement of system through the establishment of Third Party Organization structure

1. Establishment of Third Party Organization structure

(1) Set up

In order to promote the protection and utilization of personal data in a balanced manner by centralizing professional expertise and securing cross-industrial, timely and appropriate enforcement of law, Third Party Organization shall be established. The personal data handling function shall be added to expand the responsibilities of the Specific Personal Information Protection Commission set forth in the Number

Law and placed under the Prime Minister. The commission will ensure the balanced promotion of personal data protection and utilization.

In addition to the functions set forth in the Number Law, Third Party Organization will be responsible for the supervision, monitoring, preliminary discussions, treatment of complaints, creation and promotion of fundamental policy¹⁰ concerning the handling of personal data and monitoring and supervision of authorized personal data protection organizations, and international cooperation.

The number of commission members will be increased. The eligibility requirements for the members shall be set to ensure balanced skills and expertise needed for promoting personal data use and distribution while considering the data protection. Expert committee may be formed. To support the commission, the administrative office shall be established.

(2) Authorities and functions

Third Party Organization shall have the power to provide guidance, conduct on-site inspections, and public announcements, in addition to the authorities and functions (advice, receipt of reports, warnings, and orders) that the competent Minister currently possesses for business operators handling personal information, it shall also have the authorities and functions (certification, removal of certification, warnings and orders) that the competent Minister possesses for authorized personal data protection organizations. Also, Third Party Organization will authorize self-regulations upon establishing a framework to protect personal data and privacy by the private sector. In constructing a framework to promote the cross-border information distribution, it will authorize and supervise private organizations that conduct certification.

Additionally, the authorities and functions of the Minister for Internal Affairs and Communications¹¹, and their relationship with Third Party Organization will be reviewed, based on surveys and studies of personal data owned by governmental and administrative agencies and independent administrative institutions.

(3) Alignments with each Ministers

Upon Third Party Organization establishment and the assignment of the above-

¹⁰ Fundamental Policy Concerning Protection of personal data is set forth in Article 7 of Current Act.

¹¹ Authorities, etc. of the Minister for Internal Affairs and Communications are set forth in the Act on the Protection of Personal Information Held by Administrative Organs (Act No. 58 of 2003) and the Act on the Protection of Personal Information Held by Incorporated Administrative Agencies, etc. (Act No. 59 of 2003).

mentioned authorities, its alignments with each Ministers shall be adjusted to enable effective enforcement and supervision centrally driven by Third Party Organization.

Recognizing the intent behind the establishment of Third Party Organization, the roles of Third Party Organization and each Ministers shall be clarified, the parties shall engage in close collaboration to avoid overlapping enforcement and ensure effective and efficient operations.

Considering the resources and structure (staff, budget, etc.) of Third Party Organization and the current state of its accumulated knowledge, an opinion¹² was voiced to put a special measure in place for collaboration with each Ministers along with the clearly defined functions and authorities to facilitate effective implementation and efficient operation as the advanced expertise has been built up in each Ministers while dealing with its administrative affairs.

Each Ministers and branches of the Ministries shall cooperate with Third Party Organization to ensure that it can appropriately and effectively perform its functions and roles.

(4) Other Matters

Third Party Organization will be in charge of the following matters:

- Receive the notice concerning the third party provisions pursuant to the Opt-out rules from the business operator handling personal information, and publish the items required by law.
- In addition to acting as the international bureau, ensure that personal data is handled appropriately by foreign business operators by providing overseas enforcement bodies with information needed for their operations.
- Advise the Prime Minister on important issues concerning the promotion of the use and protection of personal data.
- In addition to reporting a status to the Diet, publish activity summaries.
- Obtain reports on the status of implementation from the heads of related governmental and administrative agencies and publish summaries.
- Create commission rules with respect to its operations.
- Conduct public relations and promote awareness and education relating to the personal data utilization and protection.

¹² The opinion was given at the “Personal Data Review Council” established under IT Strategic Headquarters.

(5) Penalties

Penalties shall be set forth to ensure the effective exercise of the authorities by Third Party Organizations, and enforce compliance to the new obligations, reflecting the nature of such obligations.

With respect to the introduction of the administrative monetary penalty system, discussions on the needs and purpose shall be continued.

2. Rule consistency among governmental and administrative agencies, independent administrative institutions, municipal governments, and business operators

For personal data owned by governmental and administrative agencies and independent administrative institutions, research and study shall take place based on the data characteristics to determine the scope to be protected and its proper handling by consulting with the organizations that own personal information and other interested parties. For this system reform, the central government shall examine the need to provide relevant information to local government bodies.

3. Disclosure

Regulations shall be put in place related to the person's right to disclosure, correction, discontinuance of utilization, etc. (hereinafter, "Disclosure") to make clear that judicial exercise of the right is possible concerning the Disclosure request by the individual. Regarding the preconditions for the right for Disclosure, rules shall be put in place based on the rules of Current Act with a consideration for a balance between the protection of the person's right and the burden on the business and for the need to prevent frivolous litigation.

V. Globalization

1. Extraterritorial application

As it is not clear whether Current Act applies to business operators that use personal data at facilities outside Japan (hereinafter, "Foreign Business Operators"), the requirements to be deemed as business operators handling personal information shall be amended.

2. Cooperation for Enforcement

In order to ensure appropriate personal data handling by Foreign Business

Operators, Third Party Organization shall be able to provide overseas enforcement bodies with information needed for their operations. In addition, Third Party Organization shall participate in the global framework for the enforcement cooperation.

3. Cross-border Transfer of Personal Data

Business operator handling personal information that transfer personal data (including personal data supplied by Foreign Business Operator) to Foreign Business Operator must undertake measures such as concluding agreements that require Foreign Business Operator to undertake necessary and appropriate measures to ensure the secure management of personal data in accordance with the technological advancements. Detailed measures corresponding to each type of data transfer and a framework to ensure the effective implementation shall be considered.

Furthermore, a framework shall be put in place whereby the private organizations authorized by Third Party Organization shall review compliance with the privacy protection standard accepted by counterparty country and then certify business operators wishing to engage in cross border data transfer (Please refer to Part III 3 Above).

VI. Other system reform items

1. Handling of business operators that handle small amount of personal information

(1) Exemption due to the nature of personal data and form of handling

When using databases created by other people such as CD-ROMs, Yellow Page and car navigations systems or when constituents cooperate to make call trees or member lists for reunions, based on the nature of personal data and form of handling, measures shall be made to define exemptions.

(2) Consideration based on the size and nature of the data and form of handling

Under Current Act, the business operators that handle personal information for fewer than 5,000 individuals are excluded from the business operators handling personal information. This rule should be abolished and necessary measures shall be taken for excluding a business operator that suffices certain requirements from the subjects of recommendations and orders when it is considered unlikely to

violate the individuals' rights and interests unless such business operator has a history of committing a breach of obligations intentionally or by gross negligence.

2. Handling of personal information for academic research purposes

Measures to be taken for the personal information handling for academic research shall be studied in consideration of academic freedom so that business operators can provide personal information to third parties without hesitation or risk of violating the individual's or third party's rights and interests.

VII. Issues to be subject for ongoing review

1. New dispute resolution system

In light of the trend in the number of complaints and inquiries, the number of warnings and orders given by the government and the ongoing emergence of disputes, the creation of a dispute resolution structure relating to the personal data protection shall continue to be studied.

2. Profiling

While innovations and new business opportunities are expected to emerge from cross-segment utilization of high diversity and high volume data, the extent of profiling and the countermeasures to prevent violation of individuals' rights shall be the subject for further study while giving consideration to the actual damages, the effectiveness of private organizations' own initiatives, and trends in other countries.

3. Privacy Impact Assessment (PIA)

Based on the implementation status of the specific personal data protection assessment under the Number Act, PIA implementations that are effective to ensure proper personal data handling without putting an excessive burden on business operators shall continue to be studied.

4. Name list sellers

Personal information sold by personal information sellers (so-called "Name List Sellers") is often used for criminal activities such as fraud and inappropriate solicitation that causes harm and damage for consumers and a violation of privacy rights, which are now a social problem.

Measurements to prevent the emergence and growth of such criminal activities and anti-consumer behavior shall continue to be studied.

- End -