

IIJ UK BCR-C Annex 4
Rules Regarding the Data Subject's Personal Data Rights

Version 1.0

14th March 2025

Internet Initiative Japan Inc.

IJJ UK BCR-C Annex 4 - Rules Regarding the Data Subject's Personal Data Rights
Version No. 1.0, 14th March 2025 Handle With Care

Version No.	Revision Date	Revision Reason & Details	Approval	Creation/Revision
Ver. 1.0	14 th March 2025	Initial Version	Sumiya	IJJ Chief Privacy Office

1. Positioning of this document

This document sets for the procedures for when there are requests from a Personal Data Subject for notification and disclosure of the purpose of the use of his/her Personal Data, and/or for revision, addition or deletion of the content, termination of use and deletion and termination of provision to a third party (referred to below as "Disclosure, etc.>").

2. Scope

The items set forth in these procedures apply to Personal Data that an IIJ Business Entity handles as Data Controllers. Personal Data that is handled by Data Processors is handled according to the documented instructions of the Data Controller.

3. Responsibility and Authority

When there are requests from Personal Data Subjects for disclosure, etc. of Personal Data, the IIJ Business Entity's CPO shall be responsible for handling such requests that its IIJ Business Entity may receive from Data Subjects, and cooperate with the IIJ CPO and the DPO to provide a response to the Data Subject where necessary.

4. Procedures for Requests for Disclosure, etc.

If there are requests from a Personal Data Subject for disclosure, etc. of Personal Data, they are to be handled according to the following procedure.

- (a) Contact information for requesting disclosure, etc. shall be provided on a webpage of an IIJ Business Entity with procedures for requesting disclosure, etc. of Personal Data.
- (b) Requesting disclosure, etc. of Personal Data could be made by any means such as postal mail, electronic / oral means.
- (c) In the requests for disclosure, etc., the IIJ Business Entity shall verify the identity of the person submitting the request or of an agent of that person, by requesting the submission of documents sufficient to verify the claimed Identity. Furthermore, if an agent is submitting the request for disclosure, etc., we shall request the submission of a letter of power of attorney.
- (d) The IIJ Business Entity shall acknowledge receipt of the verified request by responding to the Data Subject promptly.
- (e) The IIJ Business Entity's CPO, where necessary in cooperation with the IIJ CPO and the DPO, shall provide a substantive response without undue delay and at the latest within one month. Such response should include a statement of the possibility of lodging, at any time, a complaint or claim with the Information Commissioner or competent Data Protection Authority (as applicable) or before a court or other competent judicial authority. In the event of a refusal to complete the request, such response should also include the reasons for not taking action. The time for response may be extended by two additional months taking into account the complexity and number of the requests. In such case, the Data Subject shall be informed accordingly.

5. Safeguard Measures

When implementing measures stipulated in these provisions, we shall implement safeguard measures so that we do not disclose or leak the Personal Data of the Data Subject.

End.

Supplementary Provisions

These rules shall take effect from 14th March 2025.