

IJJ UK BCR-C Annex 6

Rules Regarding the Personal Data Protection Organization

Version 1.0

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Internet Initiative Japan Inc.

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Ver. 1.0	14 th March 2025	Initial Version	Sumiya	IJJ Chief Privacy Office

1. Positioning of this document

These regulations set forth the appropriate division of roles for Personal Data protection at all IIJ Business Entities.

2. Personal Data Protection Organization

- (1) The Chief Privacy Officer (“IIJ CPO”) shall be appointed by the IIJ President. The President of IIJ shall support the IIJ CPO in performing his/her tasks.
- (2) Each IIJ Business Entity, as listed in Annex 1 to the Binding Corporate Rules, shall have a Chief Privacy Officer (“IIJ Business Entity’s CPO”), assisted by the IIJ Business Entity’s Chief Privacy Office, to cooperate with and assist the Data Protection Officer (“DPO”) regarding data protection.
- (3) The IIJ Business Entity’s CPO, as well as a Personal Data Protection Auditor shall be designated by the company president of the IIJ Business Entity. The company president shall ensure that the Personal Data Protection Auditors do not receive any instructions regarding the exercise of his/her tasks, are involved, properly and in a timely manner, in all issues which relate to their respective tasks, and support them in performing their respective tasks.
- (4) For the relevant departments of the IIJ Business Entity, the IIJ Business Entity’s CPO shall appoint persons responsible for data protection matters in their department. These persons shall appoint those employees in their department that process Personal Data and shall be responsible for those employees.
- (5) The Training Manager shall be appointed by the IIJ Business Entity’s CPO.
- (6) Contact persons for complaints and consultations shall be appointed by the IIJ Business Entity’s CPO.
- (7) The IIJ CPO and IIJ Business Entity’s CPO will consult with the DPO whenever they face a question regarding the interpretation or application of the UK GDPR that has not been resolved by reference to the existing rules and guidance.

