

IIJ UK BCR-P Annex 2

Scope of Personal Data - Procedures for Identifying Personal Data

Version 1.0

14th March 2025

Internet Initiative Japan Inc.

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

1. Positioning of this document

This document sets forth the procedures for identification of Personal Data provided for use in work.

2. Procedures for Identifying Personal Data

(1) The Chief Privacy Officer shall, once a year, ask the executive for a report on whether or not Personal Data has been handled in tasks for which the executives are responsible.

(2) The Chief Privacy Officer, based on the report written above, shall identify the handling of Personal Data.

(3) The major departments that are responsible for tasks handling Personal Data shall confirm the Personal Data control methods and processes for the Personal Data handling tasks for which they are responsible, and enter the results in the Personal Data Control Ledgers.

(4) The Chief Privacy Office shall confirm and approve of the Personal Data Control Ledgers created by the responsible departments.

3. Ongoing Procedures for Identifying Personal Data

(1) Addition of new tasks

When there are new tasks that involve the handling of Personal Data, the executive shall submit a report to the Chief Privacy Officer. The above-mentioned 2 (2) to (4) shall apply mutatis mutandis to subsequent procedures that lead to Personal Data identification.

(2) Periodic Reviews of Personal Information Control Ledgers

The departments in charge of Personal Data handling work shall carry out reviews of Personal Data Control Ledgers at least once each fiscal year, and shall perform ongoing maintenance controls so that there is no omission in the identification of Personal Data, or omissions, etc. in the deregistration of personal Data from the Personal Data Control Ledger for which identification has turned out to be unnecessary due to destruction or return, etc.

(3) Changes to Personal Data Control Ledgers

At times when changes have occurred, such as in the details of Personal Data handling tasks, the major departments in charge of Personal Data handling tasks shall revise the Personal Data Control Ledger. The above-mentioned 2 (3) to (4) shall apply mutatis mutandis to subsequent procedures.

4. Recording in Personal Data Control Ledgers

The following items pertain to Personal Data Control Ledgers, however, they are not limited to these items. If other items are deemed necessary for operations, they can be set forth.

- (1) Collection purpose or use purpose (including the purpose for providing it to a third party)
- (2) Collection route (do not list it if there is no collection act)
- (3) Party it is provided to (do not list it if there is no provision act)
- (4) Consignee (do not list it if there is no consignment act)
- (5) Retention Time Period
- (6) Method of Disposal or Return

END

Supplementary Provisions

These rules shall take effect from 14th March 2025.