

IJJ UK BCR-P Annex 5
**Procedures Regarding Complaints and Consultations
Relating to Personal Data**

Version 1.0

14th March 2025

Internet Initiative Japan Inc.

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 forth the procedures when there are complaints and consultations from Data Subjects relating to Personal Data (referred to below in these rules as “complaints, etc.”).

2. Responsibility and Authority

If the Data Subject has filed a complaint against the processing of his/her Personal Data by an IJ Business Entity acting as a Data Processor, that IJ Business Entity will actively support the complaint processing response that the Data Controller carries out.

Further, the IJ Business Entity shall have the duty to communicate a claim or request without undue delay to the Data Controller without obligation to handle it (except if it has been agreed otherwise with the Data Controller).

Where an IJ Business Entity acts as a Data Processor, and where the Data Controller on whose behalf it processes the Personal Data factually disappears, ceases to exist in law or has become insolvent, the IJ Business Entity will undertake to handle the complaint in accordance with the procedures stipulated in Sections 3 to 6.

When there are complaints, etc. from Data Subjects, the IJ Chief Privacy Office is ultimately responsible for handling them. Data Subjects may lodge complaints in writing on paper by sending a letter to the addresses listed in Annex 1 of the IJ UK BCR-P Policy, or electronically by sending an email to the following e-mail address iijgroup-dpo-contact@ij.ad.jp. Complaints may be lodged verbally at the following phone number: +81-3-5205-4466. Other contact details may be specifically provided by the relevant IJ Business Entity.

All complaints received by any Executives or Others of the IJ Group at any other address of IJ Business Entities will be immediately forwarded to the IJ CPO and the DPO.

3. Procedures for Handling Complaints

(1) If there are “complaints, etc.” from Data Subjects, prompt and appropriate follow up shall be conducted as set forth in “Rules Regarding the Data Subject’s Personal Data Rights”

(2) The department that has received the complaints, etc., will record the details of the complaints, etc. by a method of recording that is normally used in such work and shall promptly contact the IJ Business Entity’s CPO.

(3) In case of rejection of a complaint, the Data Subject will be informed that he or she may lodge a complaint or claim before the Information Commissioner or competent Data Protection Authority (as applicable) or before a court or other competent judicial authority, prior to exhausting the IJ’s complaint process, pursuant to Section 5 of the IJ UK BCR-P Policy.

(4) In case a complaint is justified and accepted, the Data Subject will be informed of this and of the way in which the IJ Group has proceeded to implement the Data Subject’s request. The Data Subject will also be informed that, in case of disagreement or dissatisfaction as to the way in which the IJ Group has proceeded, he or she may at any time lodge a complaint or claim before the Information Commissioner (with respect to Personal Data from the UK to which the IJ UK BCR-P applies) or other competent judicial authority, prior to exhausting the IJ’s complaint process, pursuant to Section 5 of the IJ UK BCR-P Policy.

(5) Competent courts are of the jurisdiction in the UK in which the Data Controller or Data Processor has an establishment or where the Data Subject has his/her habitual residence.

(6) The exhaustion of this internal complaint system procedure is not necessary for the Data Subject to validly lodge a complaint or claim before the Information Commissioner and/or court.

4. Response Time Frame

(1) The IIJ Business Entity's CPO will acknowledge receipt of a written complaint received from the Data Subject concerned within ten (10) working days.

(2) The IIJ Business Entity's CPO will make a substantive response within one (1) month starting from the date the complaint was *de facto* received by the IIJ Business Entity (regardless of the date when the receipt of the complaint was acknowledged).

(3) If, due to the complexity of the complaint and the number of requests, a substantive response cannot be given within one (1) month the Data Subject will be advised accordingly with a reasonable estimate for the timescale within which a response will be provided (not exceeding two (2) additional months).

5. Record Handling

(1) The DPO will maintain records of complaints, etc. using a ledger, etc.

(2) Based on the records in the previous item, the DPO analyses complaints, etc. and reviews the handling procedures.

6. Reports to Senior Management, Including the Company President

The DPO shall make a report to senior management about the details of complaints, etc. as well as the handling results, at least once a year.

END

Supplementary Provisions

These rules shall take effect from 14th March 2025.