

IIJ UK BCR-P Annex 8
Rules regarding the Training on Personal Data Protection

Version 1.0

14th March 2025

Internet Initiative Japan Inc.

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

1. Training Manager

IIJ Business Entity's CPO shall nominate the manager (henceforth "Persons in charge of Training", or "Training Manager ") responsible for training and awareness of Personal Data protection.

2. Educational contents

Education on Personal Data protection shall include at least the following items:

- (1) The importance of conformity with laws and ordinances concerning Personal Data protection and its advantages.
- (2) The division of roles and responsibilities within the company to comply with laws and regulations concerning Personal Data protection.
- (3) The expected results upon violation of laws relating to Personal Data protection.

3. Training Plans

- (1) Training Managers shall formulate an "annual training plan" for every accounting period, and shall obtain the approval of the IIJ Business Entity's CPO. The "annual training plan" concerns annual training on basic information security for Executives and Others of the IIJ Business Entity, as well as more in-depth training for employees whose regular tasks may include the processing of Personal Data and employees in charge of development, operation and management of systems or tools that may affect Personal Data.
- (2) Based on the "annual training plan", the Training Managers shall draw up the individual training plans for the training on Personal Data protection, and shall implement training programmes accordingly. New entrants shall receive training regarding Personal Data immediately after starting their employment, and shall not be assigned any work involving processing of Personal Data until their training program has been completed.
- (3) IIJ Business Entity's CPO, the person responsible for data protection matters in a given department in the IIJ Business Entity (who is responsible for the employees in his/her department that process Personal Data) and the Training Managers shall have the full support of the IIJ Business Entity and its President as well as IIJ and its President in their efforts to ensure that Executives and Others, and all other relevant employees, can receive training in accordance with "annual training plan".

4. Confirming the level of understanding

The Training Managers shall check the understanding among the Executives and Others, and other participating employees at the end of the training, in order to ensure an appropriate understanding and application of the BCR-P and data protection laws. Those Executives and Others, and other participating employees whose level of understanding is not considered to be sufficient have to participate in a supplemental training program specified by the Training Manager.

5. Record-keeping.

- (1) The Training Managers shall create and keep a record of trainings, and shall report to the DPO, the IIJ CPO and IIJ Business Entity's CPO annually, or upon their request, on the content, implementation and results of training programs.
- (2) The Training Managers shall maintain a record of Executives and Others, and other relevant employees who participated in the training, and set up a re-education opportunity for those who did not participate in the training.

6. Ensuring effectiveness of trainings

The Training Managers shall check the effects of the training, and reflect the steppingstones in the "annual training plan". The Training Managers shall also prepare an annual report for the DPO, IIJ CPO and the IIJ Business Entity's CPO regarding the content, implementation and results of the training programmes.

7. Report to DPO

The Training Manager shall prepare an annual report on the content, implementation and results of the trainings and shall submit this to the IIJ CPO, who in turn informs the DPO of the report.

END

Supplementary Provisions

These rules shall take effect from 14th March 2025.