

IJJ UK BCR-C Annex 3

**Procedures Regarding Risk Analyses, etc. 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	IJ Chief Privacy Office

1. Positioning of this document

This document sets forth the risk analysis procedures for Personal Data.

2. Scope

Risk analyses relating to Personal Data shall be carried out for all Personal Data in the possession of IIJ Business Entities.

3. Risk Analyses Procedures

(1) Department that Carries Out Risk Analyses

The IIJ Business Entity's CPO or persons designated by the IIJ Business Entity's CPO shall carry out risk analyses in consultation with the DPO.

(2) Analytical Procedures

- (a) Risk analyses shall be carried out for each task related to Personal Data.
- (b) Risk analyses shall be carried out for each individual work process that handles Personal Data.
- (c) Risk analyses shall identify the types of threats and the specific risk factors that cause the threats to occur.

4. Organizing Countermeasures

- (1) Countermeasures shall be considered for each of the risks identified based on the preceding paragraph.
- (2) From the conceivable countermeasures, countermeasures that are feasible to execute shall be identified, in terms of impact of the risk occurrence, frequency of occurrence, status of handling of the Personal Data and cost vs. effectiveness.
- (3) Of the identified risks, for risks that are to be accepted, the reason for acceptance and future plans to address them etc. must be clearly stated.

5. Reviews

Periodic reviews of risk analyses and countermeasures shall be conducted at least once a year. If there are changes to the content of tasks that handle Personal Data, reviews shall be conducted as necessary.

END

Supplementary Provisions

These rules shall take effect from 14th March 2025.