Information Security Considerations (Japan)

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A Practice Note describing the key laws, regulations, enforcement practices, and local resources to consider when developing, implementing, and maintaining an information security program in Japan or as applied to data originating from Japan. This Note also addresses guidance from the Personal Information Protection Commission (PPC) and managing cybersecurity obligations under the Act on the Protection of Personal Information (APPI), the Basic Act on Cybersecurity, and sector-specific laws and regulations. The Japan-specific guidance in this Note may be used with the generally applicable resources listed in the Global Information Security Toolkit.

Information security programs protect the confidentiality, integrity, and availability of data and information technology (IT) assets. However, differences in local data security laws, practices, and standards create challenges for global companies and failure to comply with them can result in enforcement action and litigation. This Note explains Japan's key laws, regulations, enforcement practices, and local resources to consider when developing, implementing, and maintaining an information security program in Japan or as applied to personal data originating from Japan.

The Japan-specific guidance in this Note may be used with the generally applicable resources listed in the Global Information Security Toolkit.

Information Security Laws and Regulations

Several laws regulate information security and set related standards in Japan, including:

- The Act on the Protection of Personal Information (APPI), which generally regulates personal data collection, use, and disclosure (see The APPI and Related Regulations and Guidance).
- The Basic Act on Cybersecurity (Cybersecurity Act), which creates a regulatory framework for recognizing and managing threats affecting critical information infrastructure (see Critical Information Infrastructure).
- Sector-specific laws and regulations which impose additional obligations on some industry sectors (see Sector-Specific Laws and Regulations).
- Other legal regimes that protect additional at-risk data, assets, and state and business interests (see Other Laws).

The APPI and Related Regulations and Guidance

The APPI protects personal information that relates to a specific, living individual and either:

- Identifies that individual or another specific individual, directly or in combination with other information.

