

## Guidance from the Personal Information Protection Commission to Our Company

September 21, 2022

BIPROGY Inc.

We hereby announce that our Company has received guidance from the Personal Information Protection Commission today.

We express our deep apologies for the significant concerns that we caused our stakeholders including the citizens and officials of Amagasaki City.

We take the guidance from the commission very seriously and will make the utmost effort to recover trust by implementing appropriate measures to prevent a recurrence of this incident.

### **Guidance from the Personal Information Protection Commission**

#### 1. Organizational Security Control Measures

Considering that BIPROGY Inc. did not have in place an organizational system for implementing appropriate security control measures such as reviewing and approving the required and appropriate measures according to risk in a comprehensive manner, and, that the Company had not established operations in compliance with regulations regarding the handling of personal data for the target activities, the Company shall establish an organizational system for implementing appropriate security control measures such as reviewing and approving the required and appropriate measures according to risk in a comprehensive manner, confirm the compliance status of regulations regarding the handling of personal data such as the Company's internal management regulations and management regulations agreed upon between the outsourcing party, and review such regulations or control organization systems as required.

#### 2. Physical and Technical Security Control Measures

BIPROGY Inc. shall ensure that measures to prevent a recurrence regarding physical and technical security control measures, which have been created, are implemented.

#### 3. Supervision of Subcontractors

Considering that BIPROGY Inc. had not performed actions required for identifying the handling status of personal data such as requesting reports from or providing instruction to subcontractors, etc. on the actual handling status of personal data, the Company shall strengthen its monitoring capabilities so that if the Company will subcontract the handling of personal data to subcontractors in the future, its responsible person with awareness and knowledge of regulations regarding security control measures and the handling of personal data can identify the status of personal data handling by subcontractors, etc. in an appropriate manner.

### **Prevention of Recurrence**

With regards to this incident, BIPROGY Inc. has implemented measures to prevent a recurrence, such as

strengthening our security control system and re-familiarizing our employees with our security policies, enforcing our rules on taking data off-premises and data transportation, and re-conducting training for all officers and employees of the Company as well as all of our subcontractors.

The Company has also established a third-party investigation committee composed of external experts and has commissioned such committee with tasks to investigate and verify facts and conduct causal analyses by ensuring objectivity and recommend remedial measures. We will continue to implement appropriate recurrence prevention measures considering the recommendations to be provided by the third-party investigation committee.

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<Press Release from the Personal Information Protection Commission>

Administrative Measures Against BIPROGY Inc. Based on the Act on the Protection of Personal Information dated September 21, 2022

[https://www.ppc.go.jp/files/pdf/220921\\_houdou.pdf](https://www.ppc.go.jp/files/pdf/220921_houdou.pdf)

Contact information for inquiries regarding this incident:

[https://www.biprogy.com/newsrelease\\_contact/](https://www.biprogy.com/newsrelease_contact/)