# Data Utilisation Guidelines



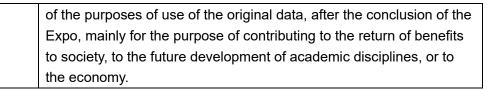
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## **Definitions**

Term De	finition			
The Organiser Jap	Japan Association for the 2025 World Exposition			
The Expo Ex	po 2025 Osaka, Kansai, Japan			
Duration of Th	e term refers to the duration of Expo 2025 Osaka (from 13 April to			
exhibition 13	13 October 2025).			
The Guidelines Da	ita Utilisation Guidelines			
	is term means the Organiser's, Data Utilisation Participants', and			
	lasi Data Utilisation Participants' provision of their own			
	organisation's data and their use of data from other systems in order			
	enrich services for visitors, etc. or sophisticate services for			
	erating the Expo.			
	is term means an organisation that has entered into a participation			
	ntract, a sponsorship contract, or other similar contracts with the			
L Data Utilisation	ganiser and provides services using various kinds of equipment			
Participant	ovided by the Organiser (an Expo service provider) which has			
sul	bmitted a data utilisation application to the Organiser and has			
	tained approval from the Organiser. Data Utilisation Participants			
COI	mprise Data Providers and Data Users.			
Data Linkage Th	is term means the mechanism prepared by the Organiser for data			
Platform	stribution of the Organiser, Data Utilisation Participants and Quasi-			
Da	ita Utilization Participants.			
_	is term means the provision and acquisition of data between the			
Platform-based Or	ganiser and a Data Utilisation Participant by using the Data			
data utilisation Lin	skage Platform at the Expo.			
	is term means an organisation that has individually contracted with			
Quasi Data	e Organiser or a Data Utilisation Participant and which has			
Utilisation	bmitted an application to the Organiser for data utilisation			
Participant be	tween the Organiser or the Data Utilisation Participant and has			
ob.	tained approval from the Organiser. Quasi Data Utilisation			
Pa	rticipants comprise Data Providers and Data Users.			
Th	is term means a person who visits the Expo, a person who			
Visitor, etc.	rticipates in the Virtual Expo, and/or uses any service offered by			
the	Organiser or by any Data Utilisation Participant or Quasi Data			
Uti	lisation Participant on a website, an app of some kind, etc.			
Ab	breviation of Value & Privacy Impact Assessment Process to			
VPIA ass	sess impacts on the value of data utilisation and privacy uniquely			
de	fined by the Expo.			
Th	is term means the secondary use of data in other business			
'''				
	cluding business operated by other organisations) following the			



## **Revision history**

Version number	Publication date	Description
1.0	September 2023	First Edition    2025/12 Terminology Revised

# Data Utilisation Guidelines Policy Part

## 1. Introduction

## 1-1. Background and Philosophy of Establishment of Data Utilisation Guidelines

## 1-1-1. Background

We are living in an era where data plays an increasingly influential part in society, business, and the life of each individual. At the same time, it is also true that there have been worrying situations concerning the use of data, which may develop into data use based on the data handlers' own rules conforming with only the minimum required laws and regulations, the monopolisation of data by specific companies, or the intrusion of privacy. For the future, it is important to create an environment that allows useful data to be provided and utilised even more than ever before, while ensuring a sense of security that data is 'properly utilised with attention given to safety.' In order to resolve these issues, the Expo aims, in the spirit of PLL (People's Living Lab), to provide a field for demonstration experiments in which individuals associated with data can participate in data utilisation processes, and to thereby achieve a future society that is enriched through value co-creation that balances the protection and use of data. To put this concept into practice, we consider it essential to specify common indicators and uniform rules with respect to data utilisation, and accordingly we have newly prepared the Guidelines.

Furthermore, for the purpose of promoting steps concerning data utilisation in the Expo in a comprehensive and effective manner, The Data Utilisation Expert Committee for Expo 2025 Osaka, Kansai, Japan was established as a consultative body, through which experts in different fields offered their advice on the preparation of the Guidelines.

<List of members of the Data Utilisation Expert Committee for Expo 2025 Osaka, Kansai, Japan (with the titles omitted and the names listed in Japanese syllabary order)>

- KISHIMOTO Atsuo, Director & Professor, Osaka University Research Centre on Ethical, Legal and Social Issues
- KOSHIZUKA Noboru, Professor, the University of Tokyo Interfaculty Initiative in Information Studies
- SHIMOJO Shinji, Professor, Faculty of Software and Information Sciences, Aomori University and Professor Emeritus, Osaka University
- TAKAYANAGI Daisuke, Director, Information Security Centre, Information-technology Promotion Agency, Japan (IPA)
- MIYATA Hiroaki [Chairperson], Thematic Project Producer, the Expo 2025 Osaka, Kansai, Japan
- · YAMAMOTO Tatsuhiko, Professor, Keio University Law School

- URYU Kazuhisa, General Counsellor, Information-technology Promotion Agency (until March 2023)
- YAMAMURO Yoshitaka, Head, the World Economic Forum Centre for the Fourth Industrial Revolution Japan (until June 2023)

## 1-1-2. Philosophy

In light of this background, with the subtheme of 'Connecting Lives' set for the Expo, we have established the philosophy of data utilisation in the Expo (VISION, MISSION, and VALUE) as follows, which should serve as common indicators for the materialisation and promotion of data-driven value co-creation.

VISION: Realisation of an inclusive and sustainable resonating society

To accomplish a sustainable society where the balancing of protection and use of data promotes value co-creation and enables individuals to

demonstrate their brilliance and diversity to resonate

MISSION: Provision of opportunities to embody value co-creation through the utilisation

of data in a reliable manner

To present a future society where daily living, business, and the entire society are enriched as people and information around the world are connected with each other, and to provide opportunities to put such a society into practice

VALUE: Transparency/Safety/Independence/Diversity/Co-creativity

To share diverse and pluralistic value and promote the creation of new value by establishing rules on data utilisation that reassure all people, and by developing a new mechanism to reflect each individual's will

## 1-2. Positioning and Composition of These Guidelines

## 1-2-1. Positioning and Composition of These Guidelines

On the basis of the above-mentioned philosophy, these Guidelines set forth the common guiding principles for data handling that the Organiser, the Official Participants and Non-official Participants of the Expo, and other persons equivalent thereto should be aware of in proceeding with their data utilisation aimed at enriching visitor services and sophisticating services for operating the Expo. These Guidelines consist of a policy part and a rule part.

## 1-2-2. Policy Part

In addition to the philosophy of data utilisation that constitutes the premise of implementation of data utilisation in the Expo, the principles of value co-creation through the utilisation of data in a reliable manner are outlined below.

The five principles of 'TRUST' for value co-creation through the utilisation of reliable data:

- 1. Transparency & Privacy
- 2. Resilience & Security
- User Controllability & Accountability
- 4. Sustainability, Equity, & Inclusivity
- 5. Together for Co-Creation

For details on the above principles, '2. Data Utilisation Principles' in the Policy Part describes the purpose and contents of each of the principles and explains the Rule Part corresponding to each of the principles.

## 1-2-3. Rule Part

The specific rules and standards necessary for actual data utilisation in the Expo are specified in the Rule Part.

Details on the rules are described in that part along with the data utilisation processes that persons who actually utilise data are required to follow.

## 1-3. Relevant Laws and Premises in Guideline Formulation

On the basis of the concept 'People's Living Lab (a laboratory for a future society)', the formulation of these Guidelines has proceeded with co-creation by many stakeholders, and the creation of these Guidelines is on the premise of the following aspects.

- (1) Observance of relevant domestic laws and guidelines
  - The Act on the Protection of Personal Information (https://www.ppc.go.jp/en/legal/)
- (2) Reference to international standards and platform standards
  - Following the concepts of 'fundamental human rights' and 'privacy protection' defined by the UN and the OECD
  - Trends in pioneering initiatives abroad, such as the European Union General Data Protection Regulation (GDPR)

- (3) Reflection of the views of academia
  - · Review by the members of the Data Utilisation Expert Committee
  - · Review by security expert members
- (4) Guarantee of sustainable business rationality
  - Review by parties related to the Organiser (including sponsors) and personnel in charge of legal affairs
  - Exchange of opinions with Participants and Non-official Participants of the Expo
- (5) Reflection of the perspectives of data-providing parties
  - · Opinions of citizens and groups that may be Visitors, etc. to the Expo

## 2. Data Utilisation Principles

The data utilisation principles are the five principles of 'TRUST' for value co-creation through the utilisation of data in a reliable manner.

## 2-1. Transparency & Privacy Principle

-Pursuing transparent data utilisation through assessment aimed at preventing unfair discrimination or prejudice resulting from data utilisation-

## 2-1-1. Purpose

By providing a series of processes to identify, assess, and deal with risks and enhancing transparency in terms of privacy throughout the life cycle of data from collection to disposal, we will strive to ensure that people visiting the Expo can use cutting-edge services based on data utilisation with peace of mind.

## 2-1-2. Description

To accomplish the above purpose, we will promote the implementation of a Privacy Impact Assessment (hereinafter, 'PIA'), a prior assessment of privacy risks entailed by services that involve the handling of the personal information of Visitors, etc.

In the provision of services that utilise the personal information of Visitors, etc., we will strive to clarify the following matters through a PIA.

- Handling of personal information: the personal information to be collected, the purposes of its use, the mechanism of handing of the information, etc.
- Measures to address privacy risks: identification of assumed risks and measures against such risks

We will demonstrate through the implementation of PIA that 'valuable services for

people and society,' for which appropriate actions are implemented to ensure legal compliance and reduce risks, are provided, and will strive to publicise our assessment of PIA results for the sake of social acceptance.

## 2-1-3. Corresponding Rules

The essence relevant to this principle is set forth in the Rules '5. Standards for Governance in Data Utilisation'.

## 2-2. Resilience & Security Principle

-Constructing a responsible structure for the management and operation of data and data utilisation in line with the Information Security Standards-

## 2-2-1. Purpose

We will strive to ensure a high level of information security by clarifying where responsibilities for information security and data utilisation in the Expo lie, and implementing measures against cyberattacks to thereby prevent the occurrence of problems such as the leakage of critical information including personal information.

## 2-2-2. Description

Each organisation that takes part in data utilisation will have a common awareness of the importance of ensuring information security, implement security measures in line with the Information Security Standards, and construct a responsible structure for data utilisation, thereby promoting appropriate data management and operation.

- Information security measures based on integrated standards
   Each organisation will strive to manage and operate the personal data of Visitors, etc.
   and other critical information in line with the Information Security Standards established by the Organiser.
- Construction of a resilience-conscious structure
   Each organisation will strive to ensure appropriate data utilisation by assigning, in
   addition to a person responsible for information security, a person responsible for
   exercising control over the data utilisation of the organisation and a person responsible
   for monitoring, providing guidance, and conducting other relevant actions in relation to
   measures for the protection of personal data.

Furthermore, in preparation for the occurrence of any flaws, each organisation will strive to construct a contact network between the Data Utilisation Supervisor of the Organiser and the responsible person of the organisation so as to be able to promptly embark on recovery work.

## 2-2-3. Corresponding Rules

The essence relevant to this principle is set forth in the Rules '2. Structure at the Organiser and Data Utilisation Participants, etc.', 7. (Standards for Management of Retained Data', and '9. Data Erasure and Disposal Standards'.

## 2-3. User Controllability & Accountability Principle

-Based on a data linkage platform, reflecting users' intentions regarding the utilisation and distribution of data and fulfilling clear and effective accountability to users

## 2-3-1. Purpose

For the Expo, we will provide a data linkage platform for centralised management of the flow of utilised data and, in relation to data associated with individuals, an environment which enables each individual to independently choose whether to allow the sharing of his/her own data. With the use of the data linkage platform and on the basis of uniform operational rules, service providers will strive to ensure reliable data distribution by specifying the contents and scope of their data utilisation in an easily understandable manner and by effectively fulfilling their accountability to users.

## 2-3-2. Description

To accomplish the above purpose, we will strive to ensure centralised management of data distribution with the data linkage platform arranged for the Expo and, in the handling of data associated with individuals, the use of the opt-in management function (with the consent of each Visitor, etc. himself/herself) which enables each individual to control his/her data according to his/her own intention, such as setting the scope of his/her data to be shared and having his/her data deleted, and will thereby ensure the satisfaction of users' intentions and reduce burdens on them.

- We will ensure that each Visitor, etc., as the principal of his/her data, can choose
  whether to allow the sharing of his/her data at the time of his/her choice, for each
  service that the Visitor, etc. uses.
- When a Visitor, etc. wishes to withdraw from a service, the distribution of his/her data in the service will be discontinued. Furthermore, relevant data in the service coordination system (such as the opt-in history) will also be invalidated with its integrity secured.
- We will strive to ensure that, at the time when each individual makes a decision in this
  regard, the individual is provided with readily understandable information as a reference
  for making his/her choice, such as the terms and conditions of use of the service
  concerned and information on PIA results, and with a user interface for centralised
  management.

## 2-3-3. Corresponding Rules

The essence relevant to this principle is set forth in the Rules '4. Data-Linkage-Platform-Based Data Utilisation and Data Catalogue Development Standards', '6. Data Acquisition Standards', '8. Data Utilisation Standards' and '10. Data Succession Standards'.

## 2-4. Sustainability, Equity, & Inclusivity Principle

-Pursuing data utilisation that recognises diverse and pluralistic value and takes account of fair and future value-

## 2-4-1. Purpose

A huge number of people from all over the world are expected to take part in the Expo, both in its real and virtual forms. We will strive to recognise the diverse and pluralistic sense of value of such participants, promote data utilisation that is valuable to people from fair and medium- to long-term viewpoints, and ensure a mechanism of value assessment on the basis of users' perspectives, while identifying the benefits of data utilisation and casting an eye on risks in the non-utilisation of data.

## 2-4-2. Description

We will promote 'Value & Privacy Impact Assessment' (hereinafter, 'VPIA') as a form of impact assessment whose coverage extends to the benefits of data utilisation, in addition to PIA, a prior assessment of privacy risks entailed by services that involve the handling of the personal information of Visitors, etc. We will clarify the benefits of data utilisation through additional implementation of value impact assessment items, and strive to confirm the social acceptance of data utilisation and achieve wider public recognition of data utilisation.

- Benefits for people and society: benefits that services to be offered will bring to individual users and to society
- Third-party assessment: confirmation of social acceptance of each provided service from the perspectives of third parties closer to the users
- Provision of information to individuals: provision of reference information that helps individuals decide whether or not to allow the sharing of their data

## 2-4-3. Corresponding Rules

The essence relevant to this principle is set forth in the Rules '5. Standards for Governance in Data Utilisation'.

## 2-5. Together for Co-Creation Principle

-Mutual use of information to return new value to society-

## 2-5-1. **Purpose**

To enrich services offered to people visiting the Expo, we will strive to co-create new value by mutually providing and utilising information acquired or generated in the Expo and return the newly created value to society.

## 2-5-2. Description

To accomplish the above purpose, we will strive to ensure the distribution of data associated with Visitors, etc., which can be obtained through services offered in the Expo, as well as data not to related individuals through the data linkage platform. Furthermore, we will promote co-creation between the Organiser and Participants and also between the Participants themselves, by compiling a catalogue of distributed data.

- Data publication and sharing
   The Organiser and those who agree with the Data Utilisation Guidelines will strive to
   publish data whenever possible or make it available for data distribution among the
   Participants of the Expo, except for data for which such publication or distribution is not
   appropriate, and to promote co-creation with the aim of creating new services.
- Development of a data catalogue

  Data Utilisation Participants will report to the Organiser on their data that can be distributed through the data linkage platform arranged by the Organiser or distributed by other equivalent means. The Organiser will organise services to be offered and information to be distributed by each Data Utilisation Participant, compile a data catalogue from the data that is to be mutually distributable and the formats of its provision, and make such catalogue available to each Data Utilisation Participant for reference. In turn, the Data Utilisation Participants can refer to the data catalogue and, if there are useful data items, apply to use such data items.
- Enhancement of interoperability for data utilisation
   In order for data users to search and find data in a cross-sectoral manner, it is
  necessary to develop a data catalogue and standardise data items. For data items that
  require standardisation, we will strive to organise such data items in light of already
  internationally standardised terminologies, data catalogues, etc.

## 2-5-3. Corresponding Rules

The essence relevant to this principle is set forth in the Rules '4. Data-Linkage-Platform-Based Data Utilisation and Data Catalogue Development Standards'.

## Data Utilisation Guidelines Rule Part

## 1. General Rules

## 1-1. Purpose and Positioning of the Data Linkage Platform

## 1-1-1. Purpose of the Rules

The Rule Part of the Data Utilisation Guidelines (hereinafter, 'Rules') is established as the unified rules for putting into practice the policies set forth in the Policy Part of the Data Utilisation Guidelines in the dissemination of the design of a future data society in the Expo.

These Rules specify the unified rules on sharing use, among the Organiser and Participants, of various types of data generated through the experience of participating in the Expo, for the purposes of improving the value of the visitors' experience and enriching and sophisticating the services offered in the Expo, such as by creating new value through the coordination of various services and the joint use of data.

## 1-1-2. Positioning of the Data Linkage Platform in Terms of Data Utilisation in the Expo

The utilisation of data including data not related to individuals and data associated with individuals, which are generated through the experience of participating in the Expo, shall be promoted in the Expo in order to create many cases of co-creation, enrich visitor services, and sophisticate services for operating the Expo.

The premise shall be that data coordination is carried out through the mechanism of data distribution arranged by the Organiser (the data linkage platform), and regulated data utilisation among the Organiser and the Participants shall be promoted through the realisation of data utilisation based on privacy protection and individuals' choices, for example, by assessing the distribution of data associated with individuals in terms of its value and privacy.

## 1-2. Scope of Application

## 1-2-1. Scope of Data Utilisation Subject to These Rules

These Rules apply to data utilisation of the Organiser and Data Utilisation Participants in the Expo and data utilisation between Quasi Data Utilisation Participants and the Organiser or Data Utilisation Participants, for the purpose of enriching services for Visitors, etc. and/or sophisticating services for operating the Expo.

## 1-2-2. Scope of Application of These Rules According to the Categories of Organisations

These Rules shall apply according to the following categories of organisations as prescribed below, respectively.

- (1) The Organiser and Data Utilisation Participants: all of these Rules are applicable.
- (2) Quasi Data Utilisation Participants: all the provisions of these Rules except those of '4-2. Data Catalogue' thereof are applicable.

### 1-3. Observance of Rules

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall have a common awareness of the importance of data utilisation in the Expo and observe these Rules in their data utilisation.

Furthermore, if individualised data handling is requested by a data provider in their acquisition of data, they shall make individual arrangements and observe such arrangements.

## 1-4. Observance of Applicable Laws and Regulations

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall observe and comply with the following treaties, laws and regulations, rules, etc. in order to protect data utilised in the Expo:

- (1) the Convention relating to International Exhibitions;
- (2) the Act on the Protection of Personal Information (Act No. 57 of 2003);
- (3) the Act on Prohibition of Unauthorized Computer Access (Act No. 128 of 1999);
- (4) the Basic Act on Cybersecurity (Act No. 104 of 2014);
- (5) the Copyright Act (Act No. 48 of 1970);
- (6) General Regulations and Special Regulations set down by the Organiser;
- (7) various rules and guidelines set down by the Organiser; and
- (8) other countries' laws and regulations concerning the protection of personal information, such as the GDPR, if such laws and regulations are directly applicable, such as where a service or product is provided to a foreign individual in the Expo with the personal information of the foreign individual processed.

### 1-5. Disclaimer

The Organiser will not assume any responsibility in connection with data provided through the Data Linkage Platform to any Data Utilisation Participants or Quasi Data Utilisation Participants in any case. Furthermore, no data provider organisation will assume responsibility for any flaw, etc. caused as a consequence of the data recipient utilising the data, except where a serious defect is found on the part of the data provider organisation.

The Organiser and Data Utilisation Participants shall prescribe the manner of handling the copyrights, intellectual property rights, and other relevant rights of data that they provide in order not to hinder other organisations from data utilisation.

## 1-6. Review of Rules, etc.

The Organiser shall evaluate these Rules and other applicable rules, etc. if there is any significant change in relevant legislation, etc., and make improvements when finding it necessary to do so.

## 2. Structures at the Organiser and Data Utilisation Participants, etc.

## 2-1. Structure within an Organisation

## 2-1-1. Data Utilisation Supervisor and Deputy Data Utilisation Supervisor

A Data Utilisation Supervisor shall be appointed by the Secretary General of the Organiser from among officials in those positions in which such officials can grasp the entire picture of data utilisation in the Expo and coordinate the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants.

A Deputy Data Utilisation Supervisor shall be appointed by the Secretary General of the Organiser from among officials in suitable positions for assisting the Data Utilisation Supervisor.

## 2-1-2. Authority and Responsibilities of the Data Utilisation Supervisor and the Deputy Data Utilisation Supervisor

The authority and responsibilities of the Data Utilisation Supervisor are as shown in (1) to (3) below. The Deputy Data Utilisation Supervisor has the authority and responsibility to assist the Data Utilisation Supervisor.

- (1) The authority to make final decisions on and responsibility for planning, implementation, and management in connection with data distribution among the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants;
- (2) the authority and responsibility to monitor the status of observance of these Rules by the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants;

and

(3) the authority and responsibility to produce subordinate documents that stipulate the procedures for implementing the provisions of these Guidelines.

### 2-1-3. Data Utilisation Officer

Each of the Organiser, the Data Utilisation Participants, and the Quasi Data Utilisation Participants shall appoint a person to be responsible for the data utilisation of their own organisation (hereinafter, 'Data Utilisation Officer').

## 2-1-4. Authority and Responsibilities of Data Utilisation Officers

The authority and responsibilities of a Data Utilisation Officer are as follows:

- the authority and responsibility to ensure observance of these Rules by the officer's own organisation;
- (2) the responsibilities to formulate a plan on data utilisation for various services to be offered by the officer's own organisation on the basis of these Rules, and to exercise control over data utilisation by the organisation in accordance with the formulated plan;
- (3) the accountability to the Data Utilisation Supervisor for the details of data utilisation by the officer's own organisation, including the purposes and means of its data utilisation and any changes to those purposes or means; and
- (4) the responsibility to report to the Data Utilisation Supervisor in the event of any incident such as data leakage or the discovery of unintended use of data.

## 2-1-5. Data Utilisation Manager

A Data Utilisation Officer may designate a Data Utilisation Manager to whom the officer may delegate part of his/her authority and responsibilities and who is to assist the officer.

### 2-1-6. Data Utilisation Staff Member

A Data Utilisation Officer may designate a person in charge of data utilisation to carry out the data utilisation of their own organisation under the control of the Data Utilisation Manager.

## 2-1-7. Data Protection Officer ('DPO')

Each of the Organiser, the Data Utilisation Participants, and the Quasi Data Utilisation Participants shall establish the position of Data Protection Officer (hereinafter, 'DPO') as the person responsible for protection of personal information in the Organiser/Data Utilisation Participant/Quasi Data Utilisation Participant, in accordance with the laws and regulations and guidelines set forth in '1-4. Observance of Applicable Laws and

Regulations' and personal information handling rules or equivalent rules of the Organiser/Data Utilisation Participant/Quasi Data Utilisation Participant.

## 2-1-8. Prohibition of Assumption of Concurrent Positions

Except in an unavoidable case, the person to apply for approval or permission in an organisation shall not concurrently serve as the person to decide the granting of the approval or permission concerned.

## 2-2. Report to Supervising Bodies for the Handling of Personal Information

Each Data Utilisation Officer shall report to the Data Utilisation Supervisor on the contact point of, and other relevant details on, the body that supervises the handling of personal information by the officer's own organisation.

## 3. Data Classification Standards

## 3-1. Classification of Data Utilised in the Expo

## 3-1-1. Personal Information of Visitors, etc.

Personal information of Visitors, etc. means data from which a living individual Visitor, etc. can be identified.

The definition and handling of personal information of Visitors, etc. for data classification purposes shall be the same as those prescribed in Japan's Act on the Protection of Personal Information. If the category of the data to be handled is not clear, the guidelines and Q&As released by the Personal Information Protection Commission in relation to the above Act shall be referred to. In addition, the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants may independently add a system for data classification and the handling of data in accordance with their respective policies, etc.

## 3-1-2. Pseudonymised Personal Information of Visitors, etc.

Pseudonymised personal information of Visitors, etc., refers to information about an individual obtained by processing the acquired personal information of Visitors, etc. so that a specific individual cannot be identified unless it is checked against other information by taking measures such as deleting some of the descriptions, etc. contained in the personal information of Visitors, etc. and deleting all of the individual identification codes.

The definition and handling of pseudonymised personal information of Visitors, etc. shall be in accordance with the Personal Information Protection Law of Japan. If the category of the data to be handled is not clear, each Data Utilisation Officer shall refer to the guidelines and Q&As released by the Personal Information Protection Commission in

relation to the Act on the Protection of Personal Information.

## 3-1-3. Anonymised Personal Information of Visitors, etc.

Anonymised personal information of Visitors, etc., refers to information about an individual that is obtained by processing the acquired personal information of Visitors, etc. so that a specific individual cannot be identified by taking measures such as deleting some of the descriptions contained in the personal information of Visitors, etc. and deleting all of the individual identification codes so that the personal information cannot be restored.

The definition of anonymised personal information of Visitors, etc. and its handling shall be governed by the Personal Information Protection Law of Japan. If the category of the data to be handled is not clear, each Data Utilisation Officer shall refer to the guidelines and Q&As released by the Personal Information Protection Commission in relation to the Act on the Protection of Personal Information.

## 3-1-4. Information Related to Personal Information of Visitors, etc.

Information related to personal information of Visitors, etc. means information on living individuals who are Visitors, etc. that does not fall under any of the categories of personal information, pseudonymised personal information, or anonymised personal information.

The definition and handling of information related to personal information of Visitors, etc. shall be in accordance with the Personal Information Protection Law of Japan. If the category of the data to be handled is not clear, each Data Utilisation Officer shall refer to the guidelines and Q&As released by the Personal Information Protection Commission in relation to the Act on the Protection of Personal Information.

### 3-1-5. Data Not Related to Individuals

Data not related to individuals means data from which relations to individuals are removed. In cases where the data classification to be handled is unclear, each Data Utilisation Officer shall ask the Data Utilisation Supervisor to make a decision.

Specific examples of data not related to individuals are as follows. Note, however, that even this information falls under the category of personal information if it can be easily cross-checked with other information to identify a specific individual.

- (1) Human flow/congestion data, energy usage, CO<sub>2</sub> concentration, amount of garbage generated, service operation status, etc.; and
- (2) information on a pavilion, tenant information, event information, etc.

## 4. Data-Linkage-Platform-Based Data Utilisation and Data Catalogue Development Standards

## 4-1. Standards for Data-Linkage-Platform-Based Data Utilisation

## 4-1-1. Data to Be Distributed on the Data Linkage Platform

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall endeavour to provide the following data to the Organiser and other Data Utilisation Participants by means of a Data Linkage Platform. For the distribution of data, it shall be a prerequisite that the data provider and the data recipient give consent in an application form prepared by the Organiser. The data shall be provided in such a manner that the data can be distributed in compliance with applicable laws in Japan.

It is not required for Quasi Data Utilisation Participants to provide data other than those items stipulated in individual contracts:

- (1) data created by using data acquired through the Data Linkage Platform; and
- (2) data acquired in the Expo (data other than that acquired through the Data Linkage Platform).

## 4-1-2. Use of the Data Linkage Function

To distribute data on the Data Linkage Platform, the Organiser, Data Utilisation Participants and Quasi-Data Utilisation Participants shall prepare an API of each system in accordance with the specifications of the counterpart API in the Data Linkage Platform.

## 4-2. Data Catalogue

## 4-2-1. Report on Data That Can Be Provided to the Data Linkage Platform

Each Data Utilisation Officer shall, with respect to data that can be provided to the Organiser and other Data Utilisation Participants through the Data Linkage Platform, report the following matters (hereinafter, 'data provision specifications') to the Data Utilisation Supervisor at the stage of planning the provision of such data:

- (1) an overview and the purpose of the service that acquired the data;
- (2) the technical specifications required for data linkage (integration API);
- (3) the specifications of the data to be provided, such as the file name, item names, and contents;
- (4) the individual rules applied to the data to be provided (including the usage rules to be applied following the data provision, such as the rules for use of open data);
- (5) whether or not the data constitutes personal information;

- (6) in the case of personal information, how to obtain consent when providing data; and
- (7) other matters that the Organiser designates as necessary.

## 4-2-2. Report on Data to Be Published

Each Data Utilisation Officer shall, when intending to publish data acquired by the officer's own organisation (excluding data acquired through data distribution between the Organiser and Data Utilisation Participants) as open data, report the following matters, etc. to the Data Utilisation Supervisor at the stage of planning of the publication of data:

- (1) the method of publicising the data (e.g., API connection, publication on a website, etc.);
- (2) the technical specifications of the data;
- (3) the specifications of the data to be provided, such as the file name, item names, and contents;
- (4) the individual rules applied to the data to be published (including its usage rules);
- (5) the frequency of data publication; and
- (6) other matters that the Organiser designates as necessary.

## 4-2-3. Development of a Data Catalogue

For the purpose of promotion of data utilisation aimed at sophisticating services offered to Visitors, etc. in the Expo, the Data Utilisation Supervisor shall organise the data provision specifications and data publication specifications of the Organiser and those types of specifications reported by Data Utilisation Participants, compile a data catalogue therefrom, and present it to the Organiser and each Data Utilisation Participant.

## 4-2-4. Procedure for Using Data Published in the Data Catalogue

The procedure for the Organiser and each Data Utilisation Participant to follow when intending to use data published in the data catalogue is as prescribed below.

## (1) Planning

The Organiser and each Data Utilisation Participant checks the presented data catalogue, the conditions under which the relevant data can be utilised, and then the integration API, and makes relevant specification adjustments in order to use the integration API.

## (2) Application

The Organiser and each Data Utilisation Participant may make an application for acquisition of data published in the data catalogue. In making an application, submit the matters set forth in '4-2-1. 'Report on Data That Can Be Provided to the Data Linkage Platform' to the Data Utilisation Supervisor.

## (3) Review

The Data Utilisation Supervisor reviews the application details of the Organiser and each Data Utilisation Participant and approves the application if there is no problem in doing so.

## (4) Testing and Operation

After the Data Utilisation Supervisor has approved the application details, the Organiser and each Data Utilisation Participant conduct an API integration test with the Data Linkage Platform. After the completion of this API integration test, the Organiser and each Data Utilisation Participant acquire data with the API and commence the provision of the relevant service.

## 4-2-5. Application Procedure for Data Acquisition Through the Data Linkage Platform

Each Data Utilisation Officer shall, when intending to acquire data through Data-Linkage-Platform-based data utilisation for any service that the officer's own organisation offers in the Expo, make an application to the Data Utilisation Supervisor at the stage of planning of such acquisition by submitting documents containing the following matters, etc.:

- (1) an overview and the purpose of the service;
- (2) the classification and name of the acquired data;
- (3) the intended use of the acquired data;
- (4) the storage and management method of the acquired data;
- (5) Information on the organisation that provides the data; and
- (6) other matters that the Organiser designates as necessary.

## 5. Standards for Governance in Data Utilisation

### 5-1. VPIA

## 5-1-1. VPIA

Each Data Utilisation Officer shall conduct a VPIA for the purpose of demonstrating in advance and in a readily understandable manner that negative elements in the planned data utilisation of the officer's own organisation, such as risks in terms of privacy, will be reduced to a minimum, and that the benefits to be gained from the utilisation will significantly exceed the disadvantages that are likely to be caused thereby. The procedure for conducting a VPIA shall be as stipulated in (1) to (5) below.

A VPIA shall be conducted in the planning phase of the service as far as possible. If any change is made to the service after the VPIA is conducted, the final update of the VPIA

shall be made before its release.

- (1) Each Data Utilisation Officer shall carry out a VPIA with the VPIA report template prepared by the Organiser, taking into account the characteristics, scope, and purposes of the data to be handled by the officer's own organisation and various applicable domestic and overseas laws and regulations, rules, etc. This provision does not preclude the implementation of any assessment independently established by the officer's own organisation in accordance with relevant rules such as its personal information protection rules or equivalent rules.
- (2) Upon having conducted a VPIA, each Data Utilisation Officer shall, on the basis of the VPIA results, consider responses to the risks recognised through the VPIA in accordance with the various rules of the officer's own organisation.
- (3) On the basis of the results of consideration of responses to the risks, each Data Utilisation Officer shall instruct those departments of the officer's own organisation that exercise control over the relevant issues and problems to deal with them by a deadline set for that purpose.
- (4) When finding it necessary to check issues and problems with other Data Utilisation Participants in a cross-sectoral manner, each Data Utilisation Officer shall report the situation to the Data Utilisation Supervisor. In response to such report, the Data Utilisation Supervisor shall instruct the other Data Utilisation Officers to conduct a check.
- (5) The specific procedure for conducting a VPIA and other relevant details are stipulated in the VPIA Implementation Guide provided by the Organiser.

## 5-1-2. Report on VPIA Results

The actions to be taken after the implementation of the VPIA are as prescribed below:

- (1) Each Data Utilisation Officer shall organise the results of the implemented VPIA and report such results to the person specified by the rules, etc. of the officer's own organisation and to the Data Utilisation Supervisor.
- (2) The Data Utilisation Supervisor may seek an explanation about the content of the report submitted by each Data Utilisation Officer according to necessity.
- (3) In the case of a significant change made in the presupposed contents of data utilisation during the implementation of a VPIA, each Data Utilisation Officer shall promptly re-implement a VPIA, revise the report, and re-submit it to the Data Utilisation Supervisor.

## 5-1-3. Third-party Assessment of VPIA Results

The inquiry of VPIA results and the publication of assessment results shall be as follows:

- (1) If the VPIA results reported by each Data Utilisation Officer are likely to include any privacy problems, including those related to the use of advanced technology, the Data Utilisation Supervisor shall make enquiries about the results to third parties appointed in advance by the Organiser in order to seek opinions from the actual beneficiaries of the service (hereinafter, 'third-party committee members'), and ask them to assess the results.
- (2) Third-party committee members shall check the content of the reported VPIA results and assess them from the perspective of Visitors, etc. who are the actual beneficiaries of the service. Items for third-party assessment are stipulated in the VPIA Implementation Guide.
- (3) The method of disclosing VPIA results, the method of disclosing the results of the third-party assessment of the VPIA results, and the scope of disclosures are stipulated in the VPIA Implementation Guide provided by the Organiser.

## 5-1-4. Responses to Third-party Assessment

Responses to third-party assessment shall be made as stipulated below:

- (1) The Data Utilisation Officer concerned shall confirm the content of third-party assessment, and judge whether it is necessary to respond to the opinions and observations shared by the third-party committee members. If he/she judges it to be necessary, he/she shall respond to the risks pointed out or correct the relevant documents in accordance with the applicable rules of his/her own organisation. After that, he/she shall revise the VPIA report and re-submit it to the Data Utilisation Supervisor.
- (2) If the Data Utilisation Supervisor determines that any response should be made after confirming the opinions and observations shared by the third-party committee members, he/she may instruct the Data Utilisation Officer related to the data utilisation to which the opinions and observations pertain to make necessary responses, without waiting for the re-submission of the VPIA revised as stipulated in (1) above.

## 5-2. Requests from Visitors, etc. Who Are Principals

### 5-2-1. Requests for Disclosure

Each Data Utilisation Officer shall establish a structure to respond to requests from Visitors, etc. themselves for disclosure of their own personal information utilised by the organisation of the Data Utilisation Officer concerned.

The response to the request will be in accordance with the Personal Information Protection Law of Japan. Refer to the guidelines and Q&A issued by the Personal Information Protection Commission regarding the Act on the Protection of Personal

Information if needed.

## 5-2-2. Requests for Correction

Each Data Utilisation Officer shall establish a structure to respond to requests from Visitors, etc. themselves for correction of their own personal information utilised by the organisation of the Data Utilisation Officer concerned.

The response to the request will be in accordance with the Personal Information Protection Law of Japan. Refer to the guidelines and Q&A issued by the Personal Information Protection Commission regarding the Act on the Protection of Personal Information if needed.

## 5-2-3. Requests for Suspension

Each Data Utilisation Officer shall establish a structure to respond to requests from Visitors, etc. themselves for discontinuance of their own personal information utilised by the organisation of the Data Utilisation Officer concerned.

The response to the request will be in accordance with the Personal Information Protection Law of Japan. Refer to the guidelines and Q&A issued by the Personal Information Protection Commission regarding the Act on the Protection of Personal Information if needed.

## 5-2-4. Requests for Deletion

Each Data Utilisation Officer shall establish a structure to respond to requests from Visitors, etc. themselves for deletion of their own personal information utilised by the organisation of the Data Utilisation Officer concerned.

The response to the request will be in accordance with the Personal Information Protection Law of Japan. Refer to the guidelines and Q&A issued by the Personal Information Protection Commission regarding the Act on the Protection of Personal Information if needed. In addition, if the data is provided to a third party, the officer shall promptly notify the recipient that a request for deletion has been made by the Visitor, etc. himself/herself.

## 5-3. Requests from Agents

In the case that it is not possible for a Visitor, etc. himself/herself to make a request due to unavoidable circumstances, each Data Utilisation Officer shall establish a structure in order to respond to requests made by an agent of such Visitor, etc.

The response to the request will be in accordance with the Personal Information Protection Law of Japan. Refer to the guidelines and Q&A issued by the Personal Information Protection Commission regarding the Act on the Protection of Personal Information if needed.

## 5-4. Self-inspection

## 5-4-1. Self-inspection

Each Data Utilisation Officer shall conduct self-inspection of the data utilisation of the officer's own organisation on the basis of evidence to confirm, for example, that its data utilisation is implemented according to the correct procedures, and whether its actual data utilisation is consistent with the details of utilisation specified in the terms and conditions of use.

## 5-4-2. Implementation Frequency of Self-inspection

Each Data Utilisation Officer shall determine the implementation frequency of self-inspection from the following frequencies according to the characteristics of the services subject to self-inspection:

- (1) daily;
- (2) weekly;
- (3) fortnightly;
- (4) monthly;
- (5) quarterly;
- (6) semi-annually; or
- (7) annually.

## 5-4-3. Utilisation of Self-inspection Results

Each Data Utilisation Officer shall, on the basis of the self-inspection results, recognise discovered faults and deviations as risks and respond to those risks in accordance with the various applicable rules of the officer's own organisation.

## 5-4-4. Report on Self-inspection Results

Each Data Utilisation Officer compiles the results of self-inspections, the results of risk response, and improvement measures, and reports them to the persons specified in the regulations of the officer's own organisation.

As a result of such self-inspection, if it is found that there is a risk of a critical impact on the operation of the Expo (such as a significant impact on the electrical systems or information technology infrastructure), the information should be reported to the Data Utilisation Supervisor.

## 5-4-5. Confirmation of Self-inspection Status

The Data Utilisation Supervisor may, periodically or as required, confirm with each Data Utilisation Officer whether self-inspection in connection with data utilisation has been correctly carried out.

## 5-4-6. Storage of Materials Related to Self-inspection

Each Data Utilisation Officer shall properly store various materials that record self-inspections conducted, in a manner that can prevent the loss of such materials, and produce them upon the request of the Data Utilisation Supervisor.

## 6. Data Acquisition Standards

## 6-1. Prior Report on Data Acquisition

## 6-1-1. Report on Personal Information and Information Related to Personal Information Acquired from Visitors, etc.

Each Data Utilisation Officer shall, when intending to newly acquire personal information of Visitors, etc. or information related to personal information from Visitors, etc. who are its principals in connection with any service that the officer's own organisation offers in the Expo, report the following matters, etc. to the Data Utilisation Supervisor at the stage of planning of such acquisition:

- (1) an outline and the purpose of the service;
- (2) the category and name of the data to be acquired;
- (3) the purposes of use of the data to be acquired;
- (4) the methods of storing and managing the data to be acquired;
- (5) the medium to be used for data acquisition (e.g., apps, websites, or paper media);
- (6) When personal information acquired is processed to prepare pseudonymised or anonymised personal information, please state so.
- (7) other matters that the Organiser designates as necessary.

## 6-1-2. Report on Data Not Related to Individuals That an Organisation Acquires on Its Own Initiative

Each Data Utilisation Officer shall, when the officer's own organisation intends to acquire data not related to individuals on its own initiative for any service that the organisation offers in the Expo, report the following matters, etc. to the Data Utilisation Supervisor at the stage of planning of such acquisition:

- (1) an outline of the service and the purpose of the service;
- (2) the category and name of the data to be acquired;
- (3) the purposes of use of the data to be acquired;
- (4) the methods of storing and management the data to be acquired;
- (5) the medium to be used for data acquisition (e.g., apps, websites, or paper media); and
- (6) other matters that the Organiser designates as necessary.

## 6-2. Standards for Obtaining Opt-in on Data Acquisition

## 6-2-1. Obtaining Opt-in on Data Acquisition

When the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants acquire personal information of Visitors, etc., they shall provide the Visitors, etc. with the following items of information in an understandable manner and obtain their consent:

- (1) the classification and name of the acquired data;
- (2) the intended use of the acquired data;
- (3) if analytical processing (profiling) is to be conducted, the purpose and subject matters of such analysis and the method of using the results of such analysis;
- (4) a statement on whether the acquired personal information of Visitors, etc. is to be processed so as to use it as the pseudonymised personal information of the Visitors, etc., to the effect that the acquired personal information of the Visitors, etc. is to be pseudonymously processed;
- (5) the use and storage period of the data to be acquired;
- (6) information on the organisation that provides the data;
- (7) the benefits that each Visitor, etc. can receive by providing his/her data; and the benefits that each Visitor, etc. will not be able to receive, and the disadvantages that each Visitor, etc. will be subject to, if he/she refuses to provide his/her data;
- (8) in the case where the data acquisition of the acquiring organisation is based on any laws or regulations, the titles of the applicable laws or regulations;
- (9) links to relevant detailed information, such as the personal information handling rules or equivalent rules of their own organisation;
- (10) the name and contact point of the acquiring organisation, and the contact point of its DPO or an equivalent position;
- (11) the rights to be recognised for each Visitor, etc. who provides his/her data, such as the

- entitlement to request data disclosure, to have his/her data corrected, and to have the use of his/her data discontinued, and the method of exercising such entitlement;
- (12) the contact point of the supervising body for the handling of personal information in connection with the data utilisation of the acquiring organisation; and
- (13) other information designated by the Organiser (brief information about the VPIA results, etc. or links to detailed information).

## 6-2-2. Obtaining Consent from Persons with Parental Authority

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall, if intending to acquire the personal information of Visitors, etc. comprising children under 16 years of age in connection with their own services offered, obtain the consent of the respective responsible persons with parental authority over those children (hereinafter, 'person with parental authority').

## 6-2-3. Addition of Opt-in Consent

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall, when intending to acquire additional data or to add a recipient of data, add the additional data, or the name of the data receiving organisation to be added, in the Organiser/Data Utilisation Participant/Quasi Data Utilisation Participant's terms and conditions of use. Furthermore, the terms and conditions of use shall be redisplayed to seek the additional consent of each Visitor, etc. at the time when this Visitor, etc. uses the relevant service of the Organiser/Data Utilisation Participant/Quasi Data Utilisation Participant for the first time after such addition to the terms and conditions.

## 6-2-4. Use of the Opt-in Management Function of the Data Linkage Platform

When Data Utilisation Participants and Quasi Data Utilisation Participants acquire personal information of Visitors, etc. by the Data Linkage Platform, they shall use the opt-in management function provided by the Organiser so that individual Visitors, etc. can manage the distribution of their personal information using the Expo ID as a key.

## 6-3. Restrictions on Data Acquisition

## 6-3-1. Use of Data Linkage Platform

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall use a Data Linkage Platform when providing data acquired at the Expo to the Organiser or other Data Utilisation Participants and when the Organiser or other Data Utilisation Participants receive data acquired at the Expo.

## 6-3-2. Consideration Concerning the Data Linkage Platform and Information

### Infrastructure

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants, when acquiring data through a Data Linkage Platform, shall not acquire data in such a manner that may have a significant impact on the information infrastructure of the Expo, such as by acquiring large amounts of unnecessary data or acquiring data frequently.

If it is difficult to distribute data through the Data Linkage Platform, but it is considered necessary for Visitors, etc. regardless of the provisions of '6-3-1. Use of Data Linkage Platforms', upon request from the person who intends to distribute the data, the Data Utilisation Supervisor may, in consultation with the Chief Information Officer of the Organiser and the Chief Information Security Officer of the Organiser, approve direct data linkage between systems with security measures specified by the Organiser.

## 6-3-3. Restrictions on Acquisition of Personal information of Visitors, etc.

The restrictions on acquisition of personal information of Visitors, etc. are as prescribed below.

- (1) The acquisition of personal information of Visitors, etc. shall be limited within the scope necessary for the services offered.
- (2) With respect to personal information of Visitors, etc., the consent of each Visitor, etc. himself/herself shall be requested, in principle, at the time when the relevant data is acquired.

## 6-3-4. Restrictions on Acquisition of Anonymised Personal Information of Visitors, etc.

Restrictions on the acquisition of anonymised personal information of Visitors, etc. and information related to personal information of Visitors, etc., shall be established as follows.

- (1) Anonymised personal information of Visitors, etc. and information related to personal information of Visitors, etc. shall be acquired to the extent that it does not conflict with the contract with the Organiser, and various laws and systems.
- (2) When the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants acquire anonymised personal information of Visitors, etc. and information related to personal information of Visitors, etc., they shall generally use means that can be widely disseminated (such as announcements on websites or applications) to make the following matters known:
  - 1 the category and name of the data;
  - ② the name and contact point of the acquiring organisation; and
  - ③ other matters that their own organisation designates as necessary.

## 6-4. Data Acquisition from Quasi Data Utilisation Participants

## 6-4-1. Arrangement of Matters under Individual Contracts

When the Organiser and Data Utilisation Participants acquire from any Quasi Data Utilisation Participant the data of Visitors, etc. that are necessary for enriching services for Visitors, etc. and/or sophisticating services for operating the Expo, they shall arrange necessary matters with the Quasi Data Utilisation Participant in connection with the data acquisition and sign an individual contract for the data acquisition.

## 6-4-2. Restrictions on Data Acquisition

The restrictions on data acquisition from Quasi Data Utilisation Participants are as prescribed below, in addition to what is prescribed in '6-3. Restrictions on Data Acquisition'.

- (1) When acquiring data from a Quasi Data Utilisation Participant, the Organiser or a Data Utilisation Participant shall do so in accordance with the contractual matters arranged with the Quasi Data Utilisation Participant.
- (2) In the acquisition of data, the Organiser and Data Utilisation Participants shall aim to enrich and sophisticate their services in the Expo and acquire their data to an extent that is not contrary to relevant contracts with the Organiser and various applicable laws, regulations, systems, etc.

## 6-4-3. Handling after Data Acquisition

The Organiser and Data Utilisation Participants shall classify data acquired from the Quasi Data Utilisation Participant in accordance with the classification system set forth in '3. Data Classification Standards', and utilise it within the scope of the contract executed with the Quasi Data Utilisation Participant.

Furthermore, it is not required to publish such data in the data catalogue prescribed in '4-2. Data Catalogue'.

## 6-5. Records Concerning Data Acquisition

Each Data Utilisation Officer shall record the following items as evidence when obtaining data on Visitors, etc., and shall make such records available to the Data Utilisation Supervisor upon request.

- (1) the category and name of the acquired data;
- (2) the purposes of use that were indicated at the time of obtaining opt-in consent and for which consent was given, and the use and storage period (in the case of personal information of Visitors, etc.);
- (3) the time and date of acquisition of the data;

- (4) information on the data provider;
- (5) information from which the individuals from whom the data was acquired can be identified, such as Expo IDs (in the case of personal information of Visitors, etc.); and
- (6) other matters that their own organisation designates as necessary.

## 7. Standards for Management of Retained Data

## 7-1. Management of Retained Data

## 7-1-1. Management of Personal Information of Visitors, etc.

The management of retained personal information of Visitors, etc. is as prescribed below.

- (1) The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall manage their personal information of Visitors, etc. retained on the premise of its Data-Linkage-Platform-based data utilisation, such that the information can be linked with the Expo IDs or the IDs designated by the Organiser.
- (2) The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall manage their respectively retained personal information of Visitors, etc. as personal information in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

#### 7-1-2. Management of Pseudonymised Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall manage, as the internal data of their respective organisations, their respectively retained pseudonymised personal information of Visitors, etc. in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

### 7-1-3. Management of Anonymised Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall manage their respectively retained anonymised personal information and information related to personal information of Visitors, etc. and their respectively retained data not related to individuals, in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

#### 7-2. Access Control on Retained Data

## 7-2-1. Access Control on Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall limit the authority to access their respectively retained personal information of Visitors, etc. to those who are required to access it, and implement measures to keep evidence of access, such as access records, in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

## 7-2-2. Access Control on Pseudonymised Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall limit the authority to access their respectively retained pseudonymised personal information of Visitors, etc. to those who are required to access it, and implement measures to keep evidence of access, such as access records, in accordance with their respective information security rules, security standards, personal information handling rules, or other rules equivalent to these, as well as the security rules, security guidelines, and other applicable rules designated by the Organiser. Furthermore, measures such as access control shall be implemented to ensure that the pseudonymised personal information of Visitors, etc. cannot be readily collated with other data.

#### 7-2-3. Access Control on Anonymised Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall implement necessary measures to control access to their respectively retained anonymised personal information and information related to personal information of Visitors, etc. and their respectively retained data not related to individuals, in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

#### 8. Data Utilisation Standards

#### 8-1. Data Utilisation

#### 8-1-1. Promotion of Data Utilisation

Each Data Utilisation Officer shall, in relation to the data acquired and retained by the officer's own organisation, promote value co-creation through reliable data utilisation in light of the five principles of data utilisation set forth in '2. Data Utilisation Principles' in the Policy Part.

#### 8-1-2. Grounds for Prohibition of Data Utilisation

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall not utilise the personal information of Visitors, etc. that they have acquired and retained of their own organisation, if any from their following matters, etc. applies:

- (1) where utilisation is outside the scope of the consent (opt-in) given by the Visitor, etc. who is the principal of the information concerned, or the scope of use indicated by the relevant VPIA or terms and conditions of use;
- (2) where utilisation violates or may potentially violate any of various contracts, rules, guidelines, etc. associated with the Expo;
- (3) where utilisation violates or may potentially violate the Act on Protection of Personal Information of Japan, other applicable laws or regulations of Japan, or any applicable foreign systems such as the GDPR; or
- (4) where utilisation may potentially have a critical impact on the operation of the Expo (such as a serious impact on the electrical/information infrastructure).

## 8-2. Standards for Obtaining Opt-in on Data Provision

### 8-2-1. Standards for Obtaining Opt-in on Data Provision

When the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants intend to provide personal information of Visitors, etc. to any third party, they shall provide the Visitors, etc. with the following items of information in a readily understandable manner, and obtain their consent for each service offered by the data recipient:

- (1) the classification and name of the provided data;
- (2) the name of the data recipient's service;
- (3) the purposes of use of the data by the data recipient;
- (4) information on the data recipient's organisation;
- (5) the terms and conditions of the relevant service of their own organisation (these terms and conditions shall list all the organisations to which data can be provided by the service concerned on the basis of the consent of the Visitors, etc. as the principals of such data);
- (6) links to relevant detailed information, such as the personal information handling rules or equivalent rules of their own organisation;
- (7) the rights to be recognised for each Visitor, etc. in connection with his/her provision of data, such as the entitlement to request data disclosure, to have his/her data corrected, and to have the use of his/her data discontinued, and the method of exercising such entitlement;
- (8) when the organisation plans to transfer the personal information of Visitors, etc. to a third country or international organisation, the name of the country (disclose also whether or not it is a government agency) or international organisation and information on the personal information protection system in the third country/organisation, information on the measures taken by the third party to protect personal information, and other information that should be of reference to the person concerned;
- (9) the contact point of the supervising body for the handling of personal information in connection with the data provision concerned; and
- (10) other information designated by the Organiser (brief information about the VPIA results, etc., or links to detailed information).

### 8-2-2. Obtaining Consent from Persons with Parental Authority

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall, if intending to provide any third party with the personal information of Visitors, etc. under 16 years of age in connection with the services that their own organisation has offered, obtain the consent of the children's respective persons with parental authority.

## 8-2-3. Use of the Opt-in Management Function of the Data Linkage Platform

When Data Utilisation Participants and Quasi Data Utilisation Participants provide personal information of Visitors, etc. to third parties through a Data Linkage Platform, they shall use the opt-in management function provided by the Organiser so that individual Visitors, etc. can use the Expo ID as a key to manage the utilisation of their personal information.

## 8-2-4. Exceptional Opt-out

The provision of personal information of Visitors, etc. in the Expo by the opt-out method (application for refusal of data provision after the fact of provision) requires approval for application of an exception to be obtained by following the procedure prescribed below in addition to the procedures prescribed in the Act on the Protection of Personal Information.

- (1) If there is a serious problem or the like in the provision of a service unless personal information of Visitors, etc. is provided by the opt-out method, the Data Utilisation Officer shall submit to the Data Utilisation Supervisor a legitimate ground for such acquisition and apply for an exception.
- (2) The Data Utilisation Supervisor reviews any application for exception submitted by the Data Utilisation Officer and, if necessary, consults with the Chief Information Officer of the Organiser and the Chief Information Security Officer of the Organiser to decide whether or not to approve the application.

#### 8-3. Restrictions on Data Provision

# 8-3-1. Prohibition of Secondary Distribution of Data Acquired Using the Data Linkage Platform

The Organiser, Data Utilisation Participants, and Quasi Data
Utilisation Participants shall not provide data acquired through a Data Linkage Platform to
other parties without using the Data Linkage Platform.

### 8-3-2. Grounds for Prohibition of Data Provision

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall not provide data if any of the following cases apply:

(1) where data provision may potentially harm any of the life, body, property, other rights or

- interests, etc. of any Visitor, etc. who is a principal of the relevant data or any of those of a third party;
- (2) where data provision may potentially and considerably damage the rights or interests of their own organisation or that of another organisation (including the Organiser's);
- (3) where data provision violates or may potentially violate any of various contracts, rules, guidelines, etc. associated with the Expo; or
- (4) where data provision violates or may potentially violate the Act on the Protection of Personal Information or other applicable laws or regulations of Japan, or any applicable foreign systems such as the GDPR.

## 8-3-3. Prohibition in Principle of Provision of Data for Value

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall not provide data for value through Data-Linkage-Platform-based data utilisation. In addition, data utilisation with Quasi Data Utilisation Participants shall be based on individual contracts.

## 8-4. Provision to Quasi Data Utilisation Participants

#### 8-4-1. Standards for Provision to Quasi Data Utilisation Participants

The Organiser and Data Utilisation Participants shall not provide any Quasi Data Utilisation Participant with any data acquired through the Data Linkage Platform, except in the case of data succession or data provision that is based on entrustment and does not amount to provision to third parties or joint use.

### 8-4-2. Arrangement of Matters under Individual Contracts

Each of the Organiser and Data Utilisation Participants shall, when providing data to any Quasi Data Utilisation Participant, arrange necessary matters with the Quasi Data Utilisation Participant in connection with the data provision and sign an individual contract for the data provision.

## 8-5. Records Concerning Data Provision

After having provided the data of Visitors, etc., each Data Utilisation Officer shall record the following matters, etc. as evidence and ensure that such records can be presented at the request of the Data Utilisation Supervisor:

- (1) the category and name of the provided data;
- (2) the purposes of use that were indicated at the time of obtaining opt-in consent and for which consent was given, and the use and storage period (in the case of personal

information of Visitors, etc.);

- (3) the time and date of provision of the data;
- (4) information on the data recipient;
- (5) information from which the individuals from whom the data was provided can be identified, such as Expo IDs (in the case of personal information of Visitors, etc.); and
- (6) other matters that their own organisation designates as necessary.

#### 8-6. Publication of Retained Data

## 8-6-1. Judgement on Whether to Publish Retained Data

Each Data Utilisation Officer shall judge whether to publish the data that the officer's own organisation has acquired and retains, in light of the various policies, etc. of the organisation. If, after the publication of the data, the Data Utilisation Supervisor finds it no longer appropriate to continue the publication of such data, the publication of the data concerned shall be promptly discontinued.

#### 8-6-2. Restrictions on Publication of Data

The restrictions on the publication of data are as prescribed below.

- (1) When publishing data, the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall do so to an extent that is not contrary to relevant contracts with the Organiser and various applicable laws, regulations, and systems.
- (2) The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall not publish personal information of Visitors, etc. or pseudonymised personal information of Visitors, etc.
- (3) The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall not publish data that may have a critical impact on the operation of the Expo (such as a serious impact on the electrical/information infrastructure).

## 8-6-3. Obligation to Endeavour to Publish Data

With respect to the publication of data, efforts shall be made to achieve publication in a form that falls under all of the following items so as to enable the public to readily use the published data (such as processing, editing, or redistributing it) through the Internet or by other means:

- (1) data to which rules allowing secondary use apply, irrespective of whether it is for profit or non-profit purposes;
- (2) data that is suitable for machine-reading; and

(3) data that is usable free of charge.

## 9. Data Erasure and Disposal Standards

## 9-1. Erasure or Disposal of an Organisation's Own Retained Data

## 9-1-1. Erasure or Disposal of Personal Information of Visitors, etc.

In the case where any of the following conditions applies, the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall promptly erase or dispose of the personal information of Visitors, etc. that their own organisation has acquired and retained:

- (1) where the purposes or period specified in the purposes of use have come to an end;
- (2) where the Visitor, etc. who is the principal of the data concerned has made a request for deletion; or
- (3) where a disposition by discontinuance of data utilisation has been imposed by the Organiser.

# 9-1-2. Erasure or Disposal of Pseudonymised Personal Information of Visitors, etc.

In the case where any of the following conditions apply, the Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall promptly erase or dispose of the pseudonymised personal information of Visitors, etc. that their own organisation has retained:

- (1) where the purposes or period specified in the purposes of use have come to an end; or
- (2) where a disposition by discontinuance of data utilisation has been imposed by the Organiser.

#### 9-1-3. Erasure or Disposal of Anonymised Personal Information of Visitors, etc.

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall erase or dispose of any anonymised personal information and information related to personal information of Visitors, etc. that their own organisation has retained and any data not related to individuals that their own organisation has retained, in accordance with relevant contracts and applicable laws and regulations; provided, however, that the wide publication of such information and data to the general public as open data shall be considered in order to contribute to the development of the economy.

## 9-2. Records Concerning Data Erasure or Disposal

When personal information of Visitors, etc. and pseudonymised personal information of

Visitors, etc. are erased or disposed of, each Data Utilisation Officer shall implement measures to keep evidence of the erasure or disposal (such as the time and date and method of erasure or disposal and the person responsible for the erasure or disposal) of these types of information in accordance with their respective information security rules, security guidelines, personal information handling rules, or other rules equivalent to these, as well as the security rules, security standards, and other applicable rules designated by the Organiser.

## 10. Data Succession Standards

#### 10-1. Data Succession

## 10-1-1. Development of Rules and Procedures Concerning Data Succession

Each Data Utilisation Officer shall set down the rules and procedures necessary for data succession in connection with the data that the officer's own organisation has retained. Data succession provided for in these Rules denotes the re-provision of data excluding data transfer due to business succession.

#### 10-1-2. Selection of Data for Succession

Each Data Utilisation Officer shall consider which data is to be succeeded to, with due consideration given to the applicable rules of the officer's own organisation, such as personal information handling rules, the Act on the Protection of Personal Information and other applicable laws and regulations of Japan, and those laws, regulations, and systems that should be observed according to the nationality of overseas personal information protection laws and regulations, such as the GDPR.

#### 10-1-3. Selection of Data Successors

In the selection of each data successor, each Data Utilisation Officer shall consider an appropriate data successor including the officer's own organisation, in light of the data subject to succession and the characteristics of each relevant service.

## 10-2. Standards for Obtaining Opt-in on Data Succession

#### 10-2-1. Obtaining Opt-in on Data Succession

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall, when succeeding to personal information of Visitors, etc. indicate the following matters in an easy-to-understand manner and obtain the consent of the Visitors, etc. once again.

- (1) the category and name of the data subject to data succession;
- (2) the purposes of use of the data subject to data succession;

- (3) the use and storage period of the data subject to data succession;
- (4) the benefits that each Visitor, etc., as a principal, can receive by consenting to data succession; and the benefits that each Visitor, etc. will not be able to receive, and the disadvantages that each Visitor, etc. will be subject to, if he/she refuses the data succession;
- (5) links to relevant detailed information, such as personal information handling rules or equivalent rules of the succeeding organisation;
- (6) the name and contact point of the succeeding organisation, and the contact point of its DPO or an equivalent position;
- (7) the rights to be recognised for each Visitor, etc. as a principal who consents to the data succession, such as the entitlement to request data disclosure, to have his/her data corrected, and to have the use of his/her data discontinued, and the method of exercising such entitlement;
- (8) when the organisation plans to transfer the personal information of Visitors, etc. to a third country or international organisation, the name of the country (disclose also whether or not it is a government agency) or international organisation, and information on the information protection system in the third country/organisation, information on the measures taken by the third party to protect personal information, and other information that should be of reference to the person concerned;
- (9) the contact point of the supervising body for the handling of personal data in connection with the data succession of the succeeding organisation; and
- (10) if the Organiser/Data Utilisation Participant/Quasi Data Utilisation Participant is to have any other organisation than the Organiser/Participant itself succeed to the relevant data, the name of such succeeding organisation.

#### 10-2-2. Obtaining Consent from Persons with Parental Authority

The Organiser, Data Utilisation Participants, and Quasi Data Utilisation Participants shall, if intending to succeed to the possession of the personal information of Visitors, etc. comprising children under 16 years of age, obtain the consent of the children's respective persons with parental authority.

# 11. Dealing with Violations of Rules and Leakage of Personal Data, etc.

## 11-1. Report of Acts Contrary to Rules

Each Data Utilisation Officer shall promptly report to the person stipulated in the regulations of his/her own organisation and the Data Utilisation Supervisor if he/she recognises an act against these regulations in his/her own organisation or by other Data Utilisation Participants.

## 11-2. Suspension of Utilisation

Measures to suspend the use of data under the authority of the Organiser shall be prescribed as follows.

- (1) If the Data Utilisation Supervisor finds or receives a report of an act that violates these regulations, he/she shall instruct the Data Utilisation Officer of the organisation that committed the act to suspend the data utilisation and correct it. The Data Utilisation Supervisor may order that data distribution using the data linkage platform be immediately suspended if there is a significant discrepancy between the contents of the applications submitted and the actual situation, if any security violation is committed, or if a serious incident occurs.
- (2) If the problematic situation is not improved under the guidance of the Data Utilisation Supervisor or if the Data Utilisation Officer concerned does not follow the instructions given, the Organiser shall urge the organisation that committed the violation to suspend data utilisation.

## 11-3. Reporting of Personal Data Leaks, etc.

In the event that a personal data leak, etc. has occurred or is feared to have occurred in his/her organisation, each Data Utilisation Officer shall promptly report to the Data Utilisation Supervisor, the person designated in his/her organisation's rules, etc., and the organisation supervising the handling of personal information reported in accordance with '2-2. Report to Supervisory Bodies for the Handling of Personal Information'. If all or part of the handling of such data is entrusted by an organisation to another party and if leakage of personal data or other problems occur or seem to have occurred on the side of the entrustee, both the entrustor and the entrustee are obliged to report, in principle. However, this shall not apply if the entrustee promptly notifies the entrustor of the occurrence of such a situation.

## 12. Miscellaneous Rules

# 12-1. Deadline for Reporting to the Organiser or Data Utilisation Supervisor

The deadline for reporting to the Organiser or the Data Utilisation Supervisor prescribed in these Rules shall be separately determined and presented by the Organiser.

# 12-2. Handling of Problems between the Organiser and Data Utilisation Participants

The handling of problems with data distribution between the Organiser and a Data Utilisation Participant or between/among Data Utilisation Participants is as prescribed below.

- (1) In the case of any problem in data distribution between the Organiser and a Data Utilisation Participant, in principle, the Data Utilisation Officers of both parties shall engage in resolving the problem.
- (2) If an objective opinion is required to resolve a problem, each Data Utilisation Officer may seek an opinion from the Organiser.
- (3) At the request of a Data Utilisation Officer, the Data Utilisation Supervisor shall offer an opinion upon checking the actual data concerned, the relevant data provision specifications, the matters under the relevant contract, and other relevant details in a comprehensive manner.

## Contact

The Official Participants can send inquiries concerning the content of this Guide or uncertainties concerning procedures to the Organiser using the Queries function in the online portal for the Official Participants.



