

# Manuals for Procedure of Processing of Complaints

V.0.2

## Manuals for Procedure of Processing of Complaints

Operational procedures for the processing of complaints over the way of managing personal information by Target Entities (PrivacyMark Accredited Private Enterprises) are outlined in the Manuals for Procedure of Processing of Complaints (hereafter “the Manuals”). The Manuals are based on the Act on the Protection of Personal Information(Article 42) and its Enforcement Regulations(Article 9-2-3).

### **1 . Purpose**

- i) When complaints over the management of personal information of Target Entities by the person, and the like over the handling of personal information, the Authorized Personal Information Protection Organization should process the complaints as necessary, and investigate the complaints. The Enterprise should be notified as to the contents of the complaints, and urged to resolve it speedily.
- ii) If it is deemed necessary in processing of complaints, the Authorized Personal Information Protection Organizations would require the Enterprise to provide a written or oral explanation, or to submit relevant documents.

### **2 . Scope of Processing of Complaints**

- i) Only the complaints from the person, and the like relates to the Target Entities (PrivacyMark Accredited Private Enterprises) would be accepted.
- ii) If the complaints would be outside this scope, the entities about which the consultation has been made would be investigated, and the results of the investigation are to be reported to the complainant, but the processing of complaints is not to be done.

### **3 . Procedures of Processing of Complaints**

- i) Explain the complainant of the Processing of Complaints;

**ii)**Decide advisability of processing of complaints;

( 1 ) Process the Complaints against the Private Enterprises that is PrivacyMark accredited and member of Authorized Personal Information Protection Organizations.

( 2 ) Processes the complaints relating to laws and to Personal Information Protection Guidelines prescribed by Authorized Personal Information Protection Organizations (Article 43, Act on the Protection of Personal Information), or to Personal Information Protection Policy of the Target Entities.

**iii)**Record and maintain the status quo and results of processing of complaints.

**iv)**In the case of the complaints could not be processed, explain the reasons clearly and introduced the other grievance machinery to the complainant.

**v)**Among complaints that are eligible for processing, report it to the relevant, i.e. Target Entities, and the like.

**vi)**Cooperate with Target Entities, and the like in the processing of complaints. consultation service process, cooperate cooperation with business enterprises or organizations that could should be considered to be involved with the consultation in question.

**vii)** Investigate and answer the eligible complaints such as inquiries on the Personal Information Protection Guidelines of Authorized Personal Information Protection Organizations and/or not related to the Target Entities.

**viii)** Request Target Entities to investigate the complaints and report in document as follows: ( 1 ) Explanation of the situations and views;

( 2 ) Countermeasures

**ix)** Recommend for Target Entities corrective actions and resubmission of the documents in case the documents prescribed in paragraph viii) were not appropriate in view of laws, the Personal Information Protection Guidelines of Authorized Personal Information Protection Organizations and/or Personal Information Protection Policy of the Target Entities.

**x)** Inform the complainant of the contents of the documents from the Target Entity and confirm its intention of assent.

**xi)** In case the complainant would not assent to the above content, meditate both sides continuously and propose the possible settlement of the dispute if

necessary.

**xii)** Once the mediation was made, declare the settlement of disputes and record the processing of complaints.

**xiii)** Process the complaints submitted to the Competent Minister if requested, and report to the Minister if necessary.