

Client Alert

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Personal Data Protection Commission: Addition of Global CBPR System to the APPI Guidelines for Cross-Border Transfers of Personal Information

Regarding this Alert Contact:



Kensaku Takase
Partner
+81 3 6271 9752
Kensaku.Takase@bakermckenzie.com



Daisuke Tatuno
Partner
+81 3 6271 9479
Daisuke.Tatuno@bakermckenzie.com



Tsugihiro Okada
Partner
+81 3 6271 9541
Tsugihiro.Okada@bakermckenzie.com

Japan's data protection authority has updated its guidelines to include the Global Cross-Border Privacy Rules System ("Global CBPR System") as a valid mechanism for international personal data transfers under the APPI. The inclusion of the Global CBPR System provides multi-national companies with an additional, streamlined mechanism for enabling compliant cross-border data transfers, particularly where overseas recipients have a sufficiently robust data management system which qualifies for Global CBPR certification.

Overview

On 12 December 2025, the Personal Information Protection Commission ("PPC"), Japan's data protection authority, released amendments to the Guidelines for the Act on the Protection of Personal Information (Transfers to Third Parties Located Overseas) (the "Amended Guidelines"). The Amended Guidelines now allow the cross-border transfer of personal information to entities certified under the Global CBPR System, which commenced operations on 2 June 2025, as an exception to the restrictions on such transfers under the Act on the Protection of Personal Information ("APPI").

Prior to the publication of the Amended Guidelines, the status of the Global CBPR System was not explicitly stated in any laws or guidelines in Japan, and it was unclear whether the System met the requirements for cross-border transfers under the APPI. However, the Amended Guidelines clarify that the Global CBPR System meets the requirements for cross-border transfer of personal information under the APPI.

Currently, 13 countries and regions are participating in the Global CBPR System, including Japan, South Korea, the US, Australia, Canada, Mexico, the Philippines, Singapore, Taiwan, the UK, Bermuda, Mauritius, and the Dubai International Financial Centre.

Cross-border transfer requirements

Under the APPI, in order for a business to transfer personal information overseas, one of the following requirements must be satisfied:

- (1) Obtain consent of the data subject.

In order to obtain a data subject's consent to an overseas transfer of personal information, a company must provide the data subject with a hard copy or electronic copy of the following information: (i) the jurisdiction where the recipient is located, (ii) information regarding the personal information protection system in the jurisdiction where the data subject's personal information will be transferred to and (iii) information



Ayako Nakano
Associate
+81 3 6271 9879
Ayako.Nakano@bakermckenzie.com



Juna Suekane
Associate
+81 3 6271 9743
Juna.Suekane@bakermckenzie.com

about measures that will be implemented by the recipient to protect the personal information.

- (2) Personal information is being transferred to a jurisdiction with a system of protecting personal information which has been recognized by the PPC as being an adequate level.

The PPC has designated the UK and countries subject to the European Economic Area (EEA) Agreement, which includes EU member states and three additional countries as having personal information protection systems which are at an adequate level to Japan. The transfer is to an overseas business which has established a system capable of continuously implementing appropriate measures as required under the APPI.

- (3) International transfers may be made to overseas businesses that maintain systems that meet the APPI's standards for continuous implementation of appropriate measures. This can be achieved through appropriate data transfer agreements or certification of the recipient's data protection practice based on a specific international framework.

Previously, the guidelines identified the APEC CBPR System as an acceptable international framework. The Amended Guidelines now also recognize the Global CBPR System as an acceptable international framework under the APPI.

The Global CBPR System may be particularly beneficial where an overseas personal information transfer recipient is certified under it. While only four Japanese companies have obtained Global CBPR System certification, 114 other companies — including global companies from the US, Singapore, South Korea and Taiwan — have obtained this certification. Companies which frequently engage in cross-border data transfers may wish to consider obtaining certification under the Global CBPR System as a means of streamlining the process in transferring personal information overseas.