

Data Protection & Cybersecurity

AI, Privacy and Cybersecurity: Key Developments in Japan

Japan has recently seen notable developments at the intersection of privacy, artificial intelligence (AI), and cybersecurity. The following developments are particularly relevant for domestic and multinational organizations operating in Japan or handling data relating to individuals in Japan.

MOJ Draft Report Addresses Legal Protection for Voices and Digital Replicas in the AI Era

On July 27, 2026, the Ministry of Justice published a draft report of its Study Group on Civil Liability for Unauthorized Use of Likeness, Voice and Other Personal Attributes. The report addresses growing concerns regarding the unauthorized use of voices, images, and other personal attributes through generative AI technologies, including deepfakes and voice-cloning tools.

The draft report clarifies that a person's voice may be protected under existing legal frameworks, including publicity rights, where the voice possesses independent economic value. While Japanese law does not currently contain specific statutory provisions regulating deepfakes or voice cloning, the report organizes the potential legal remedies available under existing doctrines, including publicity rights, privacy rights, and general tort law.

The report reflects increasing regulatory attention to the risks posed by AI-generated content and digital impersonation. Organizations developing or deploying generative AI systems, synthetic media technologies, digital-avatar services, or AI-based marketing tools should closely monitor further developments, as the report may serve as a foundation for future policy initiatives and litigation involving the unauthorized use of personal attributes.

FSA Urges Financial Institutions to Address Emerging Frontier AI Cyber Risks

On May 22, 2026, the Financial Services Agency (FSA) issued a request titled "Short-Term Responses by Financial Institutions to Evolving Threats Arising from Frontier AI." Recognizing that advances in frontier AI may rapidly transform the cyber threat landscape, the FSA urged financial institutions to assess the implications of AI-driven threats and strengthen their cybersecurity preparedness.

The request highlights concerns that increasingly capable AI systems may lower barriers for malicious actors and facilitate more sophisticated cyberattacks. In response, the FSA encouraged financial institutions to enhance risk



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assessments, monitor emerging AI-related threats, and review existing security controls and incident response frameworks. The initiative demonstrates that Japanese regulators are increasingly treating AI-related cybersecurity risks as an immediate governance and operational issue rather than a purely future concern.

Cyber Incidents Emphasize the Importance of Supply Chain Security

Recent cyber incidents in Japan have highlighted the growing importance of supply chain cybersecurity. Several reported attacks have involved third-party service providers, software development environments, and logistics networks, rather than direct compromises of a company's core systems.

For example, a recent incident affecting a Japanese food logistics company demonstrate how vulnerabilities across broader business ecosystems can lead to significant operational disruption. These incidents underscore the importance of vendor due diligence, third-party risk management, and incident response planning as key elements of corporate cybersecurity programs.

Looking Ahead

Taken together, these developments reflect Japan's growing efforts to address the legal and operational challenges created by AI and increasingly sophisticated cyber threats. Organizations should continue monitoring regulatory developments, reviewing governance frameworks, and assessing whether their privacy and cybersecurity programs remain fit for purpose in an evolving risk environment.

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