

Japan's Act on the Protection of Personal Information (APPI)

FAQs: Addendum to Autodesk Privacy Statement

Last Updated: 12.8.2026

1. What is the APPI?

The Japan Act on the Protection of Personal Information ("**APPI**") is the country's main comprehensive data protection law. Similar to the European Union's General Data Protection Regulation ("**GDPR**"), the APPI aims to protect individual's personal information by regulating the handling of personal information, including imposing certain requirements for handling personal information, international transfers, and gives individuals, referred to as "principals" under the APPI, certain rights over their personal information.

The APPI was first passed in 2003 and came into force in 2005. APPI have gone through several amendments in 2017, and significant amendments were promulgated in 2020 and 2021 and entered into effect at in stages between 2020 and April 2023.

Most recently, Japan enacted further amendments in **July 2026** following its latest triennial review. These amendments introduce additional measures relating to individuals' rights, the use and provision of personal information, and enforcement. Most of the new provisions have not yet taken effect and will be implemented on dates to be specified by the Japanese Government.

The APPI is enforced by the Personal Information Protection Commission ("**PPC**"), an independent government agency charged with overseeing compliance with the APPI, promulgating guidance regarding the law's implementation, and determining the adequacy of other countries' data protection regulations, among other responsibilities.

2. What is the territorial scope of the APPI?

Similar to the **GDPR**, the **APPI has extraterritorial reach**. This means that businesses located outside Japan may be subject to the APPI when they handle the personal information of individuals in Japan, or certain information derived from that personal information, in connection with providing goods or services to individuals or businesses in Japan.

The APPI also provides the **Personal Information Protection Commission (PPC)** with enforcement and international cooperation powers in relation to foreign businesses that are subject to the APPI. The PPC may, among other things, require information from foreign businesses, conduct investigations, and issue corrective orders where appropriate. The PPC may also cooperate and share relevant information with data protection or enforcement authorities in other countries, subject to the applicable legal framework and cooperation arrangements.

3. What does it mean to process personal information?

"Personal information" is broadly defined under the APPI to as information relating to a living individual ("principal") that can identify that person either directly or by combining the information with other information. This means that descriptors, recordings, individual identification codes or numbers, as well as other records or data that can indirectly identify a living person in Japan would be considered as "personal information" as well.

APPI uses the term "handling" of personal information, which would include both the "controller" and "processor" functions in other data protection legislation. The "handling" of personal information might

involve collecting, maintaining, storing, accessing, using, processing, transferring, and disclosing personal information, among other activities.

4. What is a “personal information handling business operator” (PIC)?

The APPI uses the term “personal information handling business operators” (“PICs”), which are business operators that handle personal information about principals. A PIC can be entrusted to handle personal data on behalf of another PIC for a purpose determined by the other PIC and subject to their supervision. In this scenario, the PIC entrusted to assist another PIC in handling personal data is similar to a “data processor” under the GDPR. The PIC determining the purpose for which personal information under their control is handled is akin to a “controller” under the GPDR.

Where we handle personal information of our employees, we act as a PIC in the “controller” function. In most cases where we provide products and services to our customers and handle personal information of principals in Japan in the process of providing products and services to our customers, we are entrusted to handle personal data of those customers, so we act in the “processor” function for that customer content.

5. What rights do individuals have under the APPI and how will Autodesk support these rights?

The APPI provides principals with certain rights. When acting as PIC, Autodesk shall facilitate the exercising of principals’ rights, where required by law. These include principals’ rights to:

- Right to be informed
- Right to request for access such as obtain identifiable information a PIC retains about them;
- Right to rectification whereby principals can request that inaccurate information about them be corrected, supplemented, or deleted;
- Right to erasure, principal has the right to require that a PIC no longer handle their identifiable information or delete their information;
- Right to restrict processing of personal information, principal can request that a PIC no longer disclose their information to third parties; and require that a PIC stop handling their information or stop disclosures of their information to third parties, if the use or disclosure of that information is no longer necessary to achieve the purpose for which the information was collected.

Principals may also submit complaints regarding the handling of their personal information to PICs that handle their personal information. These complaints may be mediated by the PPC, if need be.

6. Does the APPI require personal information to stay in Japan?

The APPI does not contain a data localization requirement, meaning that there is no requirement to retain personal data in Japan.

However, the transfer of principals’ personal data out of Japan is subject to appropriate safeguards. We understand that cross-border transfers are permitted where the principal gives their prior consent so long as the principal is provided with certain information regarding the transfer ahead of time and details concerning the data protection regulations of the country to which their personal data is to be sent.

Please note that, PIC may transfer a principal’s personal data out of Japan without seeking the principal’s prior consent if one of several limited exceptions apply, such as:

- the PIC has provided the principal an opportunity to opt-out of the transfer, in accordance with the APPI, and the principal has not done so;
- the transfer is for the joint use of multiple business operators, in accordance with the APPI; or
- the transfer is to a recipient PIC which is entrusted to handle personal data on the transferor PIC's behalf.

Under each of these exceptions, the transfer must be to a European Economic Area ("EEA") jurisdiction or to the United Kingdom (the only jurisdictions with data protection regulations so far deemed to provide an "adequate" level of data protection determined by the PPC), or be subject to appropriate data protection safeguards, such as a data protection agreement between the parties sending and receiving the personal data.

7. Does Autodesk jointly use personal data?

We may jointly use personal information with our affiliates, based on the joint use exception as explained in Paragraph 6 above. Our affiliates may share and jointly use your personal information for any of the purposes described in the Section "How does Autodesk use the information it collects about you?" in our Autodesk Privacy Statement. The categories of personal data to be jointly shared and used are the same as described in the Subsection "Information we collect from other parties" under the Section "What information does Autodesk collect about you?" Autodesk Ltd. Japan as indicated Section 10 below is responsible for the joint use.

8. Does the APPI create special rules for minors?

The APPI do not explicitly make reference to minors.

9. How will Autodesk demonstrate compliance with the APPI?

We are committed to practicing transparency in how we handle personal data. Although there are currently no specific certifications to demonstrate compliance with the APPI, we conduct internal assessments to maintain our obligations under the APPI. Further, we maintain ISO certifications for the operational environment of certain cloud products and have undergone SOC 2 compliance audits for select cloud products. For additional information, please visit our [Trust Center](#). You can find our updated Privacy Statement for Japan [here](#).

10. How can I contact Autodesk's Japanese affiliate?

Autodesk's Japanese affiliate is Autodesk Ltd. Japan. Its contact information is below.

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