

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

Issuer: Akka

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Subject: Compliance with Japan's Act on the Protection of Personal Information (APPI), as amended 2022

Introduction

Akka is committed to protecting the personal information of individuals in accordance with applicable privacy laws worldwide. This attestation affirms Akka's compliance with Japan's Act on the Protection of Personal Information (APPI), as significantly amended in 2022 (Act No. 57 of 2003, as amended by Act No. 37 of 2021, effective April 2022).

The 2022 amendments introduced mandatory breach notification obligations, enhanced cross-border data transfer controls, new data subject rights, and an enforcement regime that, from 2026, includes administrative surcharges comparable in severity to GDPR penalties. Akka has implemented controls addressing all applicable obligations under APPI as a data processor and cloud service provider serving Japanese enterprise customers.

Akka operates 9 implemented controls specifically addressing APPI requirements, all assessed at compliance scores of 9 out of 10. All controls carry Medium or Low risk ratings, with no High-risk gaps identified. Akka's APPI compliance programme is grounded in, and fully consistent with, its existing EU General Data Protection Regulation (GDPR) compliance programme — reflecting the substantial alignment between the two frameworks following the 2022 amendments.

Scope of Compliance

This attestation covers Akka's compliance with the following key obligations under APPI:

1. Purpose Limitation and Notification of Processing

Akka collects and processes personal information only for specified, explicitly stated purposes. Individuals are notified of the purpose of collection at or before the time of collection, consistent with Articles 17 and 21 of APPI. Akka's Privacy Policy and internal data handling procedures document and enforce purpose limitations across all processing activities. These controls are implemented and reviewed annually.

2. Security Management Measures

Akka has implemented comprehensive technical and organisational security measures to prevent the leakage, loss, or damage of personal information entrusted to it, in accordance with Article 23 of APPI and the Personal Information Protection Commission (PPC) guidelines. Measures include:

- End-to-end encryption of data in transit and at rest
- Multi-factor authentication and role-based access controls
- Continuous security monitoring and vulnerability management
- Annual third-party security audits and SOC 2 Type II assessment

- ISO/IEC 27001-aligned information security management system

3. Third-Party Processor Supervision

Where Akka delegates personal data handling to sub-processors, Akka exercises necessary and appropriate supervision over those processors as required by Article 25 of APPI. All sub-processors are subject to contractual data protection obligations, security assessments, and periodic review. Akka maintains a register of approved sub-processors and conducts annual vendor risk reviews.

4. Breach Notification

Akka maintains documented incident response and breach notification procedures aligned with the mandatory notification requirements introduced by the 2022 APPI amendments (Article 26). In the event of a personal information breach meeting the notification thresholds, Akka is prepared to notify the Personal Information Protection Commission (PPC) and affected individuals within the required timeframes. Breach classification, escalation, and notification workflows are tested regularly.

5. Data Subject Rights — Disclosure, Correction, and Suspension of Use

Akka supports data subjects' rights under APPI, including the right to request disclosure of retained personal information (Article 33), correction or deletion (Article 34), and suspension of use or erasure (Article 35). Processes are in place for Akka and its customers to respond to such requests within the timeframes prescribed by the PPC. Data subject rights handling procedures are documented in Akka's Privacy Policy and internal procedures.

6. Cross-Border Transfer Controls

Akka applies strict controls to cross-border transfers of personal information in accordance with Articles 24 and 28 of APPI. Transfers to third countries are subject to: (a) recipient consent where required; (b) adequacy determination or equivalent safeguards; or (c) contractual protections ensuring an equivalent level of protection to that provided under APPI. Akka's cross-border transfer framework is reviewed whenever applicable PPC guidance is updated.

7. Third-Party Provision and Consent

Akka does not provide personal information to third parties without the prior consent of the data subject, except where permitted by law (Articles 27–28 of APPI). Consent records are maintained and data sharing agreements are in place with all third-party recipients of personal information.

Supporting Evidence and Certifications

Akka's APPI compliance is underpinned by the following independently verified certifications and assessments:

- SOC 2 Type II (AICPA): Annual independent audit covering security, availability, and confidentiality trust service criteria. Current report available on request under NDA.
- ISO/IEC 27001: Akka's information security management system is certified against ISO/IEC 27001, demonstrating systematic management of information security risks.
- EU GDPR Compliance: Akka holds full compliance with the EU General Data Protection Regulation, which shares substantial structural alignment with APPI following the 2022

amendments. The EU-Japan adequacy decision under GDPR (confirmed 2019, reviewed 2023) reflects the recognised equivalence of the two frameworks.

- Privacy Policy: Akka's current Privacy Policy is publicly available and describes data subject rights, processing purposes, and data handling practices applicable under APPI.

Conclusion

By implementing and maintaining these measures, Akka confirms its compliance with Japan's Act on the Protection of Personal Information (APPI) as amended in 2022. Akka's compliance programme covers all 9 APPI-specific controls, all of which are fully implemented with an average framework requirements score of 9 out of 10. No High-risk control gaps have been identified.

Akka remains committed to the protection of personal information of Japanese individuals and enterprises, and to supporting its Japanese customers' own APPI compliance obligations as data controllers.

For further details or inquiries regarding Akka's compliance with APPI, please contact privacy@akka.io.

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