

Section 2 Concentrating Data with Platform Providers

In line with increasing volumes of data distribution and advances in data utilization, data is becoming concentrated with some platform providers.

This section provides an overview of the current state and background of data acquisition and storage by platform providers. It also addresses two issues caused by

the concentration of data with platform providers, which are "harm to a fair competitive environment" and "concerns about transparency and fairness in the handling of acquired and stored data," and it examines each country's response to these issues.

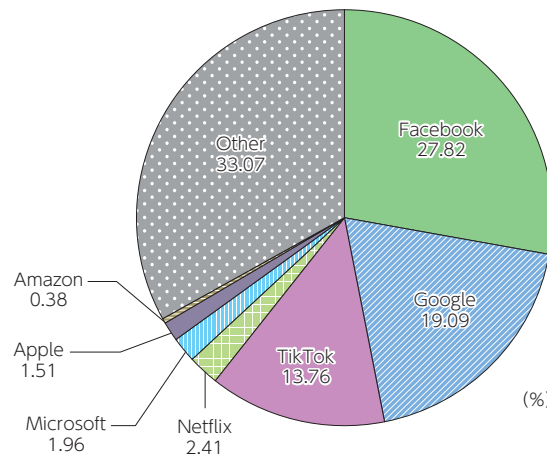
1. Data Acquisition and Storage by Platform Providers

As information and communications technology have advanced and massive amounts of data have been generated, platform providers have grown rapidly as innovators that continue to generate innovative businesses and markets. Currently, various services offered by platform providers have penetrated deeply into our lives. Using search services to find things what we want to know,

communicating on social media and watching videos on the Internet are all part of everyday life for many people.

According to SANDVINE (Canada),¹ Facebook has the largest share of mobile internet traffic by application (company) in the world at 27.82% followed by Google at 19.09%, TikTok at 13.76%, and Netflix at 2.41% (**Figure 2-2-1-1**).

Figure 2-2-1-1 Mobile Internet traffic by application (first half of 2022)



(Source) Prepared based on "PHENOMENA (THE GLOBAL INTERNET PHENOMENA REPORT JANUARY 2023)" by SANDVINE.

Furthermore, according to a study by Statista, all five GAFAM (an acronym for Google, Apple, Facebook, Amazon, and Microsoft) companies were included in the

top 10 platforms with the most monthly users in the U.S. as of July 2022.



Figure (related data) Platforms with the most monthly unique users in the U.S. (July 2022)

(Source) Statista "Most popular multi-platform web properties in the United States in July 2022, based on number of unique visitors"

URL: https://www.soumu.go.jp/johotsusintokei/whitepaper/eng/WP2023/data_collection.html#f00014

(Data collection)

¹ "The Global Internet Phenomena Report January 2023" was compiled by SANDVINE, which collected data from more than 2.5 billion subscribers using more than 500 fixed and mobile telecom operators worldwide. It is important to note that the report covers North America, South America, Europe, Asia, and the Middle East but does not include data from China or India.

Through the provision of various services, platform providers acquire attribute data, such as names, user names, and IP addresses, and various activity data, such as purchasing activities and communications (Figure

2-2-1-2). Considering the large number of users using their services, it is assumed that these platform providers acquire and accumulate huge amounts of data.

Figure 2-2-1-2 Example of data items collected by platform providers

Data item	Platform			
	Google	Facebook	Amazon	Apple
Name	○	○	○	○
User name	-	-	○	-
IP address	○	○	○	○
Search word	○	-	○	○
Content	-	○	-	-
Link between content and displayed ads	○	○	-	-
Time, frequency, and duration of activity	○	○	-	○
Purchasing activity	○	-	○	-
Persons with whom you communicated	○	○	-	-
Activity in third-party apps	○	-	-	-
Browsing history	○	-	○	-

(Source) Prepared using an extract from "The Data Big Tech Companies Have On You" by Security.org

2. Issue (1): Impediments to a Fair Competitive Environment due to Platform Providers Having an Oligopoly on Data

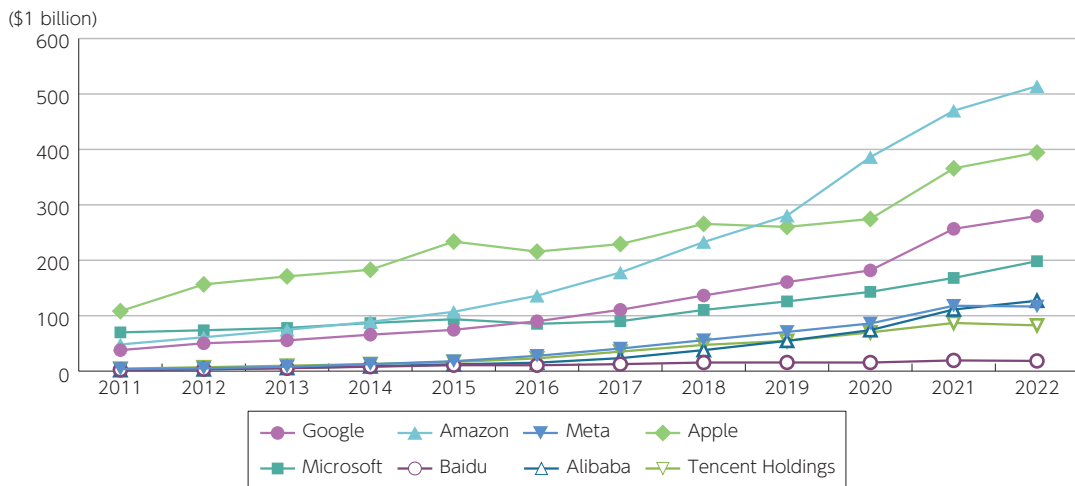
(1) The current status and background

In recent years, GAFAM and other platform providers have established a strong economic position in the digital-related market by utilizing the vast amount of collected data for businesses, etc., and their market dominance has further increased.

15 companies by market capitalization in the global digital-related market, with Tencent (7th) and Alibaba (13th) also making the list.² Looking at the sales trends of these companies, it can be seen that they have all been expanding sales at a high rate (Figure 2-2-2-1).

As of the end of March 2023, GAFAM were in the top

Figure 2-2-2-1 Sales trends of major platform providers



(Source) MIC (2023) "Survey Research on ICT Market Trends in Japan and Abroad"

The services provided by platform providers have a network effect,³ where the more participants a network has the more valuable the network becomes and the

more participants it attracts. As a result, services with large numbers of users tend to be able to gain more users and grow in size. This concentration of data with plat-

² See Part 2, Chapter 4, Section 6. Platform trends.

³ The effect of a person joining a network and not only increasing the utility to that person but also increasing the utility to other subscribers is called the "network effect." The network effect can be divided into direct and indirect effects. The "direct effect" is when the utility to subscribers of a network increases as their number increases. The "indirect effect" is when an item (e.g., a hardware device) and its complementary item (e.g., software) are closely related, and as the item is used more, more complementary items corresponding to it are supplied, thereby increasing its utility.

form providers through the network effect and economies of scale, etc. increases the utility to users. And as the platform providers integrate and utilize the data and build business models based on the data, it creates a cycle in which the platform providers further accumulate and utilize data, resulting in them maintaining and strengthening their competitive advantage.⁴

In addition, the services offered by platform providers are said to have high switching costs.^{5,6} When the switching cost is high, users are hesitant to switch even if there are other cheaper, higher-quality alternatives. In particular, when a platform provider provides various services that are interlocked, the switching cost becomes higher. As a result, the user is locked in to the service provider, reducing the competition between services.

Concerns about the strengthening of the market dominance of platform providers and the data oligopoly have also been raised in other countries. For example, the U.S. House Committee on the Judiciary conducted a study on digital market competition titled "Investigation of competition in digital markets," and it identified the following as the main issues with respect to platform provider oligopolies:

- (1) There is a winner-takes-all market structure because the more users there are due to the network effect, the stronger the ability to attract other users
- (2) Platform providers may act as gatekeepers to other

(2) Initiatives by each country to ensure a fair and appropriate market environment

In order to ensure a competitive environment in the market, countries are taking measures to strengthen regulations and promote transparency with respect to

a Japan

In Japan, the Japan Fair Trade Commission is conducting investigations based on the provisions of the Antimonopoly Act. For example, in 2016, they investigated Apple⁷ because it was suspected that while operating the App Store, which lists applications for the iPhone, Apple was restricting the business activities of business operators that provide applications with respect to sales of digital content.⁸ In February 2023, the Japan Fair Trade Commission released its "Market Study Report on Mobile OS and Mobile App Distribution" in which it assessed that there was not enough competition in smartphone operating systems and app stores, where the market is split between Apple and Google and that a healthy competitive environment needs to be created.

business operators entering the market

- (3) There are high switching costs when users switch to another service
- (4) Online services have structures that make it easy to retrieve and concentrate data

As the market dominance of platform providers increases, there is a risk that other companies may be prevented from entering the business, and competition between companies may be hindered. Platform providers are also in a position to operate and manage their platforms and conduct transactions that disadvantage business operators using their platforms. Currently, a considerable amount of data, such as internet activity history, communication history, and location information, has already been accumulated by some platform operators, and the utilization of such data can provide highly convenient services to users. However, because of the lock-in effect, it is possible that diverse competition utilizing data will not be ensured, and high-quality services will not be provided to users in the medium to long term.

In order to promote the appropriate distribution and utilization of data and create diverse businesses and services utilizing data, it is important to prevent excessive enclosure of data by some business operators and ensure a transparent and sound competitive environment.

platform providers and others that are expanding their market dominance.

In addition, in order to improve the transparency and fairness of transactions on digital platforms, the Act on Improving Transparency and Fairness of Digital Platforms (Act No. 38 of 2020) came into force in February 2021. Under the act, companies that provide digital platforms with a particularly high need to enhance transparency and fairness in transactions are designated as "specified digital platform providers."⁹ They are required to report their operational status to users, including advance notice of disclosures and changes to transaction conditions, to ensure fairness in operations and the status of complaint handling and information disclosures.

⁴ <https://www.jftc.go.jp/dk/guideline/unyoukijun/dpfgl.html>

⁵ The switching cost is the financial, procedural, and psychological burden incurred by an individual to switch from the product or service the individual is currently using to another alternative product or service.

⁶ The Ministry of Economy, Trade and Industry, the Japan Fair Trade Commission, and the Ministry of Internal Affairs and Communications (2018) "Summary of interim issues concerning the development of a trading environment for digital platform providers"

⁷ Apple submitted an improvement measures offer, such as revising the provisions of the related guidelines. The Japan Fair Trade Commission examined the offer and found that the above issue would be resolved. Therefore, the review was concluded after confirming that Apple would implement improvement measures in the future. <https://www.jftc.go.jp/houdou/pressrelease/2021/sep/210902.html>

⁸ Suspected violation of the provisions of Article 3 (Private Monopolization) or Article 19 (Unfair Trade Practices, Paragraph 12 [Trade Subject to Constraints], etc.) of the Antimonopoly Act

⁹ As of October 2022, in the comprehensive online retail mall category, three companies, Amazon, Rakuten, and Yahoo, were subject to restrictions. In the app store category, two companies, Apple/iTunes and Google LLC, were subject to restrictions, and in the online advertising category, three companies, Google, Meta Platforms, and Yahoo, were subject to restrictions.

b The U.S.

In the U.S., there has not been much movement to regulate companies, including platform providers, which are private companies, but in recent years there have been moves to strengthen regulations on platform providers from the perspective of competition policy. In July 2019, the Department of Justice (DoJ) announced a major antimonopoly investigation of GAFA (an acronym of Google, Apple, Facebook, and Amazon), and a hearing on antitrust laws with respect to GAFA was held before

c The EU

In Europe, the Digital Market Act (DMA) and the Digital Service Act (DSA) have been developed as the Digital Service Act Package to solve various online issues, such as the significant evolution of platform services, increasing concentration and power imbalances, and new problems, such as disinformation.

The DMA,¹⁰ which aims to create an open digital marketplace, imposes obligations on providers of large core platform services identified by the European Commission as gatekeepers¹¹ to prohibit unfair service delivery and data handling. It stipulates that gatekeepers should do specific things, these include: (1) allow third-party services to interoperate with gatekeeper services under certain conditions; (2) allow business users to access

d China

In August 2022, the Anti-Monopoly Law was amended to include measures aimed at platform operators that prohibit operators with a dominant market position from

the U.S. House Committee on the Judiciary in July 2020.

In October 2020, the DoJ filed an antitrust lawsuit against Google, alleging that its search service had a market monopoly, which violated antitrust laws. In January 2023, the DoJ and eight states filed a lawsuit against Google's internet advertising business for alleged partial antitrust violations and sought a partial separation of its advertising business.

data generated using the gatekeeper platform; and (3) allow business users to enter into contracts with customers outside the gatekeeper platform. It also stipulates that gatekeepers should not do specific things, these include: (1) display their own services and products in preference to other services on the platform; (2) prevent users from linking to companies outside the platform; and (3) track users on services other than the gatekeeper's platform services for targeted advertising purposes without obtaining valid consent. If a gatekeeper violates these obligations or prohibitions, the European Commission can impose a fine equivalent to up to 10% of the previous fiscal year's global sales.

abusing their position by using data, algorithms, technology, platform rules, etc.

3. Issue (2): Concerns about transparency and appropriateness of data acquisition and utilization by platform providers

(1) The current status and background

As mentioned above, through the provision of services, platform providers have acquired a range of data from a huge number of users, and they have used that data to grow their businesses. One example is its use in digital advertising.

The digital advertising market continues to grow at a high rate, and when we look at global advertising spending by medium, digital advertising is expected to reach \$394.4 billion in 2022 (up 13.7% year on year).¹² In Japan, of the 2,480.1 billion yen (115.0% year on year) spending on internet advertising media in 2022, search-linked advertising spending was 976.6 billion yen (122.2% year on year), video advertising spending was 592 billion yen (115.4% year on year), and social advertising spending, such as for social media and video sharing, was 859.5

billion yen (112.5% year on year); thus, spending in each area grew significantly.¹³

Google and Facebook, which offer advertising services that link with search engines and social media, earn more than 80% of their revenue from advertising by connecting their platforms, which serve as places for people to gather, with their advertising businesses. In 2022, Google's ad revenue was about \$224.5 billion (79.4% of total revenue), and Facebook's ad revenue was about \$113.6 billion (97.5% of total revenue). Together, the two companies made about \$338.1 billion (44,461.5 billion yen). Considering that the Japanese advertising market is 7,102.1 billion yen, we can see how huge this amount is (**Figure 2-2-3-1**).

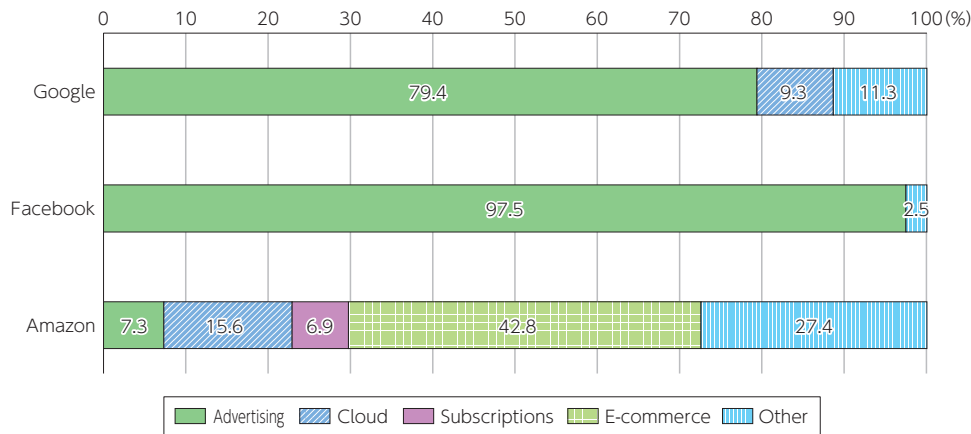
¹⁰ The DMA came into effect on May 2, 2023, but with respect to preparatory work, including the adoption of enforcement rules and guidelines, the DMA actually began to apply from November 1, 2022.

¹¹ The European Commission's criteria for identifying gatekeepers include annual regional sales of at least €7.5 billion over the past three years or an average stock market capitalization of at least €75 billion in the previous fiscal year as well as at least 45 million monthly users of platform services in the region and at least 10,000 annual business users.

¹² "Global Ad Spend Forecast (2022 to 2025)" (Dentsu Group) <https://www.group.dentsu.com/jp/news/release/000888.html>

¹³ "Detailed Analysis of Japan's Advertising Expenditures on Internet Advertising Media in 2022" (Dentsu Group) <https://www.dentsu.co.jp/news/release/2023/0314-010594.html>

Figure 2-2-3-1 Advertising spending as a percentage of platform provider sales (2022)



(Source) Prepared based on the published data of each company

Against this backdrop, countries are investigating and prosecuting the use of data by platform providers

(Figure 2-2-3-2).

Figure 2-2-3-2 Cases of investigation and prosecution of platform providers

Overview	Details
Use search data to lower search rankings of other companies' shopping sites (Google)	<ul style="list-style-type: none"> In December 2017, the European Commission sued Google for using user search data to rank its Google Shopping service higher than other similar services. In November 2021, the European General Court upheld the European Commission's complaint. In February 2022, Swedish price comparison service PriceRunner sued Google for similar reasons.
Leverage data from third-party sellers who use Amazon to develop their own products (Amazon)	<ul style="list-style-type: none"> In 2020, the Wall Street Journal reported that Amazon was using sales data for third-party products to develop its own products. In April 2022, the U.S. Securities and Exchange Commission (SEC) began investigating the case.
Facebook linked to Facebook Marketplace (Meta)	<ul style="list-style-type: none"> In December 2022, the European Commission linked Facebook to Facebook Marketplace, an advertising service for the sale of goods between individuals, and warned Meta for distorting competition in the market for similar services. The European Commission also pointed out that Meta imposes adverse conditions on competing business operators that advertise on Facebook and Instagram, which allowed them to leverage data related to competing ads.

(Source) MIC (2023) "Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information"

(2) Consumer awareness

Major platform providers acquire and analyze personal data, such as end user attribute information, location information, purchase histories related to e-commerce, and viewing histories related to video and music distribution, and they provide value-added services, such as presenting advertisements and content according to the preferences of each end user. Meanwhile, there are also growing concerns about transparency and fairness in the acquisition and handling of such data by platform providers. The Ministry of Internal Affairs and Communications conducted a questionnaire survey of consumers in Japan, the U.S., Germany, and China in order to understand their attitudes toward the acquisition, accu-

mulation, and use of data by major platform providers.

First, consumers in each country were asked about their experiences using internet services provided by major platform providers (multiple responses). Across all countries, Google Maps (66.5%), YouTube (63.8%), Amazon (online shopping) (61.3%), Gmail (56.1%), Google Search (55.3%), and Facebook (50.2%) were the most used. In Japan, the most used were YouTube (79.1%), Gmail (65.2%), and Google Maps (63.6%). In China, the percentage of user's using their own country's services was high, including WeChat (90.8%), WeChat Pay (88.6%), and Alipay (85.3%).



Figure (related data) Services that individuals have used (multiple responses)

Source: MIC (2023) "Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information"
 URL: https://www.soumu.go.jp/johotsusintokei/whitepaper/eng/WP2023/data_collection.html#f00020
 (Data collection)

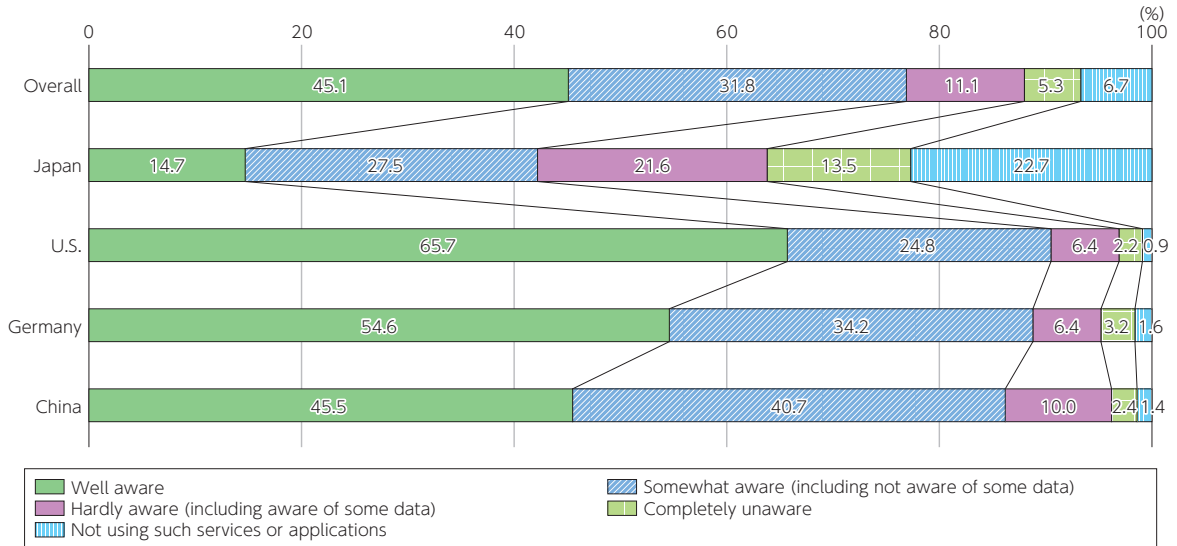
Next, when asked whether or not they were aware they were providing their personal data to platform providers when using these kinds of services and applications, the U.S. had the highest percentage of respondents who answered that they were aware (the sum of “Well aware” and “Somewhat aware”) at 90.5%. In Japan the percentage was 42.2% (Figure 2-2-3-3).

many had the highest number of respondents who answered that they felt concerned (the sum of “Very concerned” and “Somewhat concerned”) at 66.5%. In Japan the percentage was 58.4% (Figure 2-2-3-4).

In all four countries, more than 50% said they felt concerned even when they were not aware they were providing personal data.

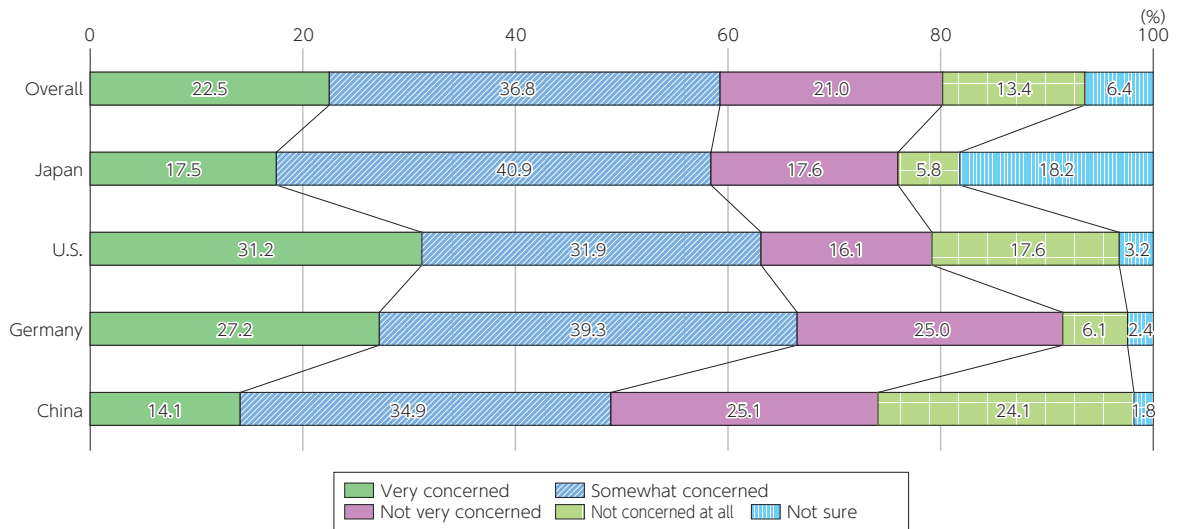
Looking at the presence or absence of anxiety, Ger-

Figure 2-2-3-3 Awareness regarding the provision of personal data



(Source) MIC (2023) “Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information”

Figure 2-2-3-4 Concerns over the provision of personal data

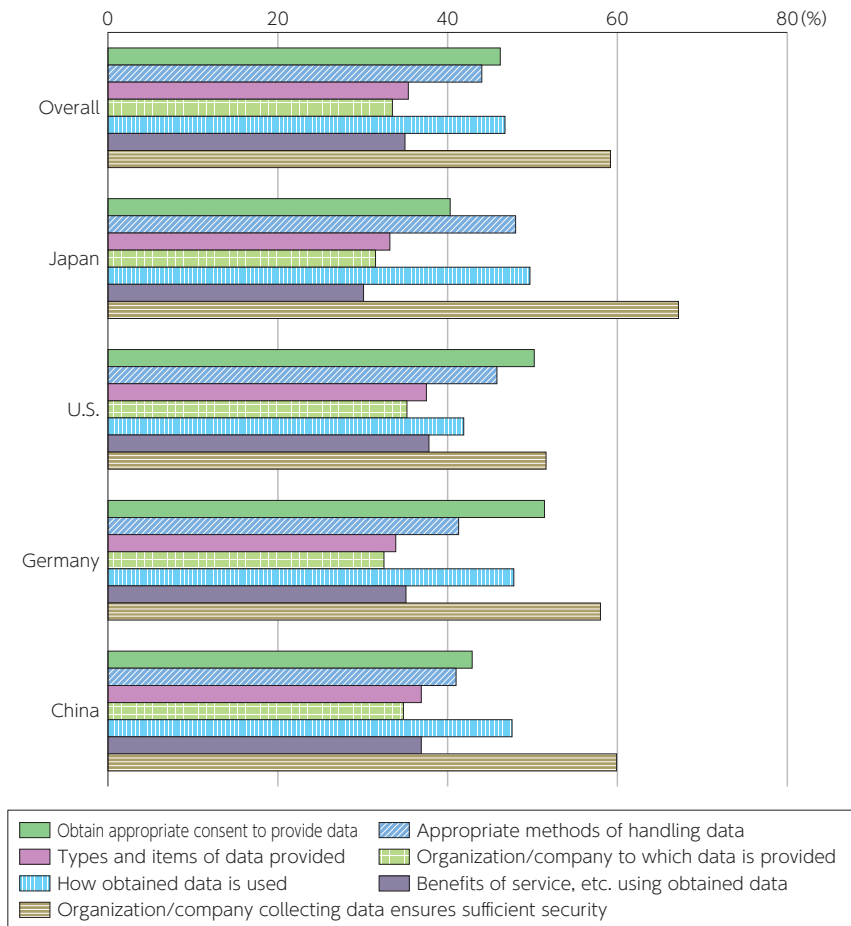


(Source) MIC (2023) “Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information”

When asked to prioritize the most important aspects of providing personal data to platform providers, “Organization/company collecting data ensures sufficient security” was the highest in all four countries. Looking at the countries individually, in Japan, the most common responses were “Organization/company collecting data

ensures sufficient security” (67.2%), “How obtained data is used” (49.7%), and “Appropriate methods of handling data” (48.0%). In the U.S. and Germany, “Obtain appropriate consent to provide data” was the second highest (Figure 2-2-3-5).

Figure 2-2-3-5 Points to consider when providing personal data



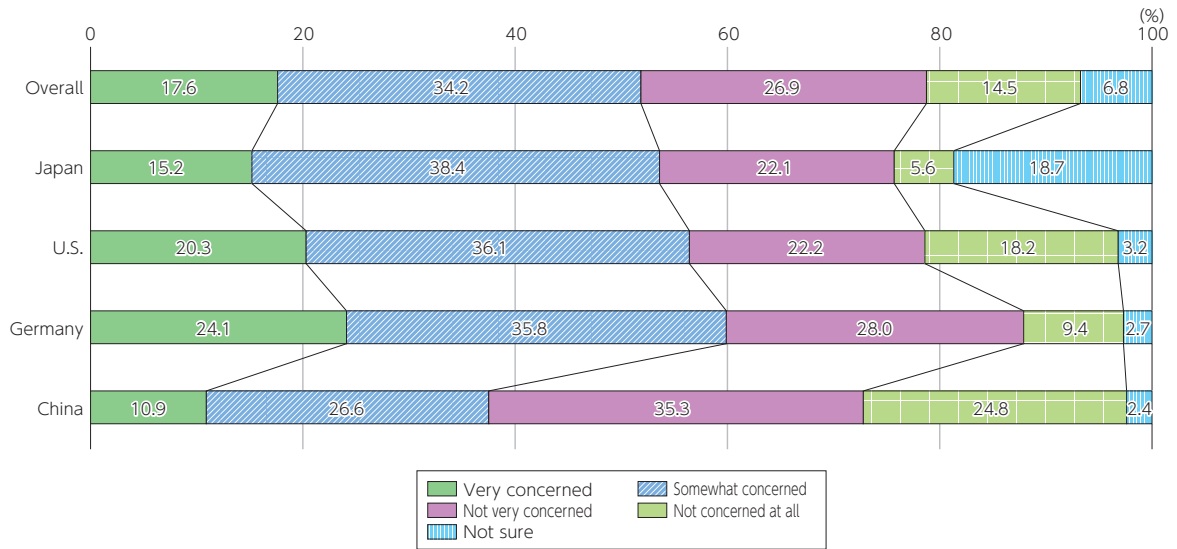
(Source) MIC (2023) "Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information"

In addition, when asked how they felt about seeing personalized (optimized) search results and advertisements associated with their use of such services, the percentage of respondents who answered that they feel concerned (the sum of "Very concerned" and "Somewhat concerned") exceeded 50% in all three countries except China, at 37.5% (**Figure 2-2-3-6**).

When asked whether the presentation of user-optimized advertisements had an impact on their use of the

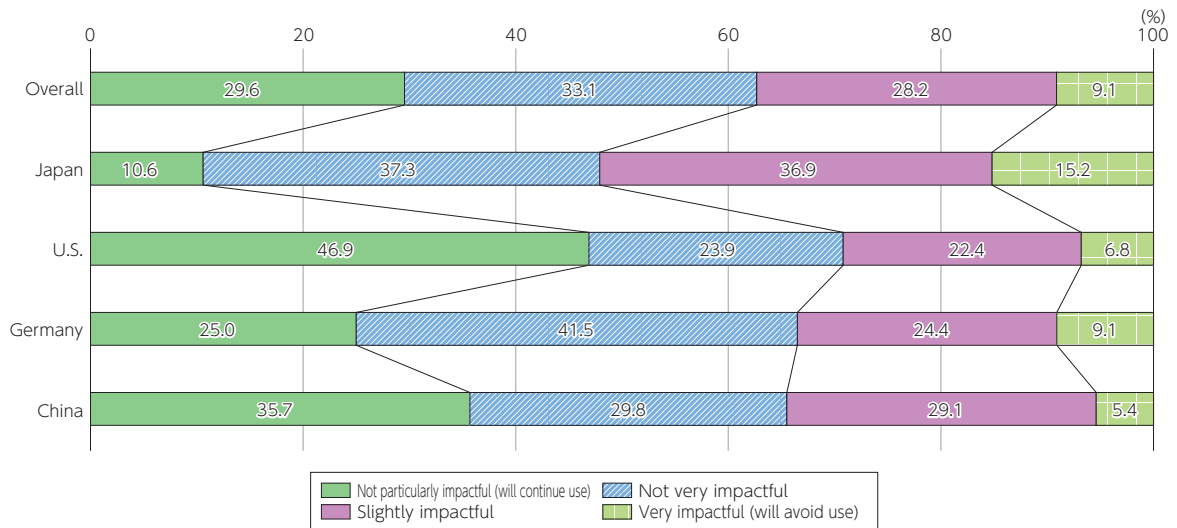
services and applications provided by major platform providers, approximately the same percentage of respondents in Japan that answered it was impactful (the sum of "Slightly impactful" and "Very impactful") also answered that it was not impactful (the sum of "Not particularly impactful" and "Not very impactful"). In the other three countries, 60 to 70% of respondents answered that it was not impactful (**Figure 2-2-3-7**).

Figure 2-2-3-6 Concerns over the display of personalized search results and advertisements, etc.



(Source) MIC (2023) "Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information"

Figure 2-2-3-7 Impact of the display of personalized advertising on usage



(Source) MIC (2023) "Survey Research on the Advancement of ICT Infrastructure and Distribution of Digital Data and Information"

As platform providers provide a variety of services necessary for people's daily lives, they are now acquiring and accumulating more sensitive data. Widespread profiling of such data to provide recommendations has improved convenience for users, but it has also increased the likelihood that users can be unwittingly in-

fluenced by the results. In order to eliminate concerns about the handling of personal data and enable users to use individually optimized digital services with peace of mind, it is important to eliminate situations where users cannot see how data is collected and utilized and ensure data is handled appropriately.

(3) Initiatives by countries to ensure the transparency and appropriateness of data distribution and utilization

As part of the development of laws for the protection of personal information, each country is regulating and responding to privacy violations caused by the collection and analysis of digital data. In addition to regulations that impose penalties in the event of violations, other means also exist, such as users having the right to request that their information is deleted and a framework

by which users can check the details of how their data is analyzed by platform providers.

In addition to legislation protecting personal information, some countries impose obligations on business operators, including platform providers, regarding the proper handling of user information.

a Japan

In Japan, the Act on the Protection of Personal Information was revised in 2020, and it came into full force in April 2022. In order to protect the rights and interests of

individuals, the 2020 amendment of the act stipulates that individuals can request the suspension or erasure of their personal data when their rights or legitimate inter-

ests are likely to be harmed, and it allows individuals to request disclosure of records provided by third parties concerning the transfer of personal data. In addition, under the opt-out provision,¹⁴ the scope of personal data that can be provided to third parties is limited, and (1) personal data that has been illegally obtained and (2) personal data provided under the opt-out provision are excluded. In addition, although it does not fall under the category of personal data at the source, regarding the provision of information to a third party that is considered to become personal data for the recipient, the recipient is required to confirm that the consent of the individual has been obtained.¹⁵

In June 2023, the Act Partially Amending the Tele-

b The U.S.

In the U.S., there is currently no comprehensive federal law on the protection of personal information, and states have different laws and regulations. In January 2020, California enacted the California Consumer Privacy Act (CCPA), the nation's first comprehensive privacy law. The law grants consumers eight privacy rights, including the right to request that their personal information be deleted.

Also, in November of the same year, the California Privacy Rights Act (CPRA), which builds on the CCPA, was passed. It made it mandatory to establish opt-out measures for cross-site tracking using third party cookies, etc. Since the enactment of the CCPA, other states, in-

c The EU

In the EU, the General Data Protection Regulation (GDPR) came into force on May 25, 2018. This regulation grants individuals various rights, including the right to request the deletion of data, the right to object to data profiling, and the right to data portability.¹⁷ The establishment of such rights is expected to ensure the protection of personal data, promote competition by preventing personal data from being locked away, create innovation from the use of personal data, and improve user convenience by promoting sharing of personal data under the control of users. Business operators are required to obtain an individual's explicit consent to collect and use personal data and to implement appropriate security measures for the risks associated with data management and processing. Violations of the GDPR can

communications Business Act (Act No. 70 of 2022) came into force. The act requires telecom operators that provide telecommunications services that have a significant impact on the interests of users to submit regulations on the handling of specified user information and publish their information handling policies, etc. In addition, when such an operator transmits information about users to external parties from the user's device, it is obligated to provide an opportunity for confirmation by doing the following: (1) notify the user in advance or placing the information in a state so that the user can easily check it (notification and publication), (2) obtain the user's consent in advance (obtaining consent), or (3) take opt-out measures (opt-out).

cluding Virginia and Colorado, have started to adopt laws modeled on the CCPA.¹⁶

Following on from this, in June 2022, a draft of the American Data Privacy and Protection Act (ADPPA) was published. The legislation would give consumers the right to access, modify, and delete their own data held by business operators, and it would prohibit business operators from collecting and using data for purposes other than those that fall under the 17 items specified in the act. If the act becomes law, it is expected to become the first comprehensive privacy protection law at the federal level.

result in fines of up to 4% of the violating business's global annual revenue (€20 million if the figure is below €20 million).¹⁸

In addition, the Digital Service Act (DSA),¹⁹ which aims to define online safety and fundamental rights, stipulates that platform providers have an obligation to protect users in accordance with the size of the business operator. In addition to ensuring transparency in online advertising (the obligation to indicate that an advertisement is an advertisement and the advertiser and the main parameters used in the decision to display the advertisement) and obtaining consent for targeted advertising, very large platform providers²⁰ have additional obligations regarding transparency in online advertising and recommendation systems.

¹⁴ It is a system that allows personal data to be provided to a third party without the consent of the person after the items of personal data to be provided are made public under the premise that use of the data will be subsequently discontinued if the individual requests that.

¹⁵ https://www.ppc.go.jp/files/pdf/200612_gaiyou.pdf

¹⁶ For example, in July 2021, Colorado passed the Colorado Privacy Act, which gives consumers the right to access, correct, or delete personal data collected by target business operators and the right to refuse not only the selling of but also the collection or use of personal data (opt-out) while also requiring target business operators to protect personal data and disclose clear, understandable, and transparent information to consumers about how they use the data. <https://www.jetro.go.jp/biznews/2021/07/509ba52fe4ead2e9.html>

¹⁷ (1) The right to receive personal data that an individual has provided to a business operator, etc. in a form that is easy for the individual to reuse, and (2) the right to transfer personal data directly to another business operator, etc. if it is technically feasible to do so

¹⁸ In Europe, there have been 1,591 cases of GDPR-related fines from when the GDPR came into force up to the end of February 2023, with the fines totaling €2.7 billion. The most common reasons for punishment were "Insufficient legal basis for data processing" at 32% followed by "Violation of general data processing principles" and "Insufficient technical or organizational measures to ensure information security." These top three reasons accounted for nearly 75% of the total.

¹⁹ The effective date of the Digital Services Act is February 17, 2024, but some provisions were brought forward and became effective as of November 16, 2022.

²⁰ Those designated by the European Commission (including search engines) with an average of 45 million or more monthly active users in the EU

d China

In September 2021, China enacted the Data Security Law, which clearly defines the concept of data, establishes basic systems, such as data classification and grading protection, risk assessment, monitoring and early warning, and emergency responses. It also defines the obligations to be fulfilled when performing data handling activities.²¹

Furthermore, in November 2021, the Personal Information Protection Law, the first basic law regarding the

protection of personal information in China, was enacted. The law stipulates obligations regarding collecting, processing, and transferring personal information for the handlers of personal information, the rights of individuals with respect to the handling of their personal information, and discriminatory pricing using algorithms and other means by internet platform providers regarding personal information.^{22,23}

²¹ <https://www.pwc.com/jp/ja/services/digital-trust/privacy/china-security.html>

²² With regard to the Data Security Law and the Personal Information Protection Law, etc., there are many provisions in which the definitions of terms used in the provisions, specific issues, such as various evaluations and examinations, and the scope of regulations are unclear, and issues are still being pointed out from the perspective of transparency and predictability.

²³ <https://www.jetro.go.jp/biznews/2021/08/68d3caa207694e4e.html>