

Specific Personal Information Protection Assessment Report (Basic Report)

Assessment Report No.	Assessment Report Name
1	Bosch Health Insurance Society Basic report on application, payment and collection related affairs

Declaration on protection of rights and interests such as personal privacy

Bosch Health Insurance Society (referred to below as “RBHI”) declares that it recognizes how handling specific personal information files during collection related affairs such as application, insurance benefits, insurance premiums, and so on could affect rights and interests such as personal privacy, and that it is addressing the protection of such rights and interests through appropriate measures to reduce the risk of leaks of specific personal information or others.

Special note

- In obtaining the Privacy Mark from JIPDEC, RBHI has been recognized as an operator that maintains and operates a system of suitable protective measures for personal information in compliance with Japanese Industrial Standard JIS Q 15001:2017.
- RBHI limits its society employees who can handle specific personal information and takes measures systematically so that other employees and outsiders cannot access specific personal information.
- RBHI makes it possible for the system to keep the operation record of "by whom", "from where" and "when" specific personal information was accessed in case that such an operation was performed.

Name of assessed organization

Bosch Health Insurance Society

Publication date

October 1, 2022

I Related information	
1. Affairs of Handling Specific Personal Information Files	
① Title of affairs	Application, payment and collection related affairs
	<p data-bbox="448 331 651 360">< System details ></p> <p data-bbox="437 371 1430 539">RBHI is aiming to streamline its health insurance operation, rationalize benefits and the burden of costs, maintaining and enhance the health of members, and improve the quality of healthcare received by members in accordance with the Health Insurance Act (Act No. 70 of 1922) and the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Act No. 27 of 2013, referred to below as the "Number Use Act").</p> <p data-bbox="437 622 1430 824">This aim is to be achieved through RBHI's various work such as formulating activities and operation plans by representatives of employers and insured persons, collecting insurance premiums, paying out insurance benefits, verifying the details of medical consultation fees, conducting health activities such as medical check-ups and fitness training, providing health care and welfare information to members, running medical and dental clinics and fitness facilities, and so on.</p> <p data-bbox="437 869 1430 1279">Furthermore, the provisions have been incorporated into the Health Insurance Act that enables "affairs related to the collection and organization of information on insured persons" and "affairs related to the use and provision of information on insured persons" to be entrusted to Health Insurance Claims Review & Reimbursement Services (referred to below as "Payment Fund") in collaboration with other medical insurers. This enables us to entrust the Payment Fund in an integrated manner with the management of unique index numbers of members' qualification history and insured persons' sub-numbers, the inquiries about personal information from local governments and the provision of such information for them through an information providing network system, the affairs for verifying the identity of members, and the operation and management of intermediary servers etc. for medical insurers to connect with an information providing network system required for processing such affairs (referred to below as "intermediary server, etc.") and servers for connecting to Basic Resident Register Network System.</p> <p data-bbox="437 1373 1430 1608">RBHI's members are either [1] insured persons who are employees at the business sites of Bosch Corporation or one of its group companies or affiliates, or their non-working dependents (ordinary members) or [2] people who have been insured persons for at least two months before retirement from the business sites of those companies and have voluntarily applied to rejoin, or their non-working dependents (voluntarily continuing members), and both of them lose their members qualification when they reach the age of 75, as applied to the medical insurance system for the elderly.</p> <p data-bbox="437 1648 651 1677"><Content of affairs ></p> <p data-bbox="437 1688 1430 1856">Among the affairs carried out by RBHI, concerning "the affairs handling the payment of insurance benefits, the implementation of healthcare work or welfare work, and the collection of insurance premiums in accordance with the Health Insurance Act" in Appended Table 1.2 of the Numbers Act, which are affairs stipulated by the ordinances of competent ministries, RBHI uses specific personal information of members such as their individual number within the following</p> <p data-bbox="437 1868 1430 1995">In the meanwhile, concerning some of notifications or applications from business sites required for health insurance affairs, business sites can convert them into electronic data and apply online via Myna Portal (social insurance, tax procedures online one-stop service) so that RBHI can accept them online from November, 2020 (※1).</p> <p data-bbox="437 2007 1430 2074">1. Application affairs (handling qualification related information, etc. applied when paying insurance benefits to members or collecting their insurance premiums)</p>

② Outlines of affairs

(1) Approving qualification according to the acquisition of qualification by insured persons, loss of qualification, changes in non-working dependents, etc., verifying individual numbers in qualification related information amendment affairs, and inquiring about qualification related information using individual numbers

(2) In cases where an individual number cannot be obtained from a company or a member, or where it is necessary to verify an individual number or the four basic items of information (name, gender, address, and date of birth), obtaining such information from Japan Agency for Local Authority Information Systems via Payment Fund pursuant to the provisions of Article 30-9 of the Basic Resident Registration Act (※2)

(3) From May 2017, registering individual numbers or qualification related information of members on an intermediary server in order to share information, acquiring the sub-numbers of insured persons, and, in cases where qualification related information has changed such as loss or change of qualification, updating registered information on an intermediary server, etc.

(4) In cases where verification information is needed to authorize the qualification of insured persons who have taken out a new policy after being transferred from other medical insurers or of their non-working dependents, inquiring about personal information from such previous insurers, etc., within a intermediary server, etc., verifying loss of qualification. In addition, the information required for qualification approval of dependents such as taxation certificates, resident's cards, and public benefit payment account information used for payment of benefits and refunds (hereinafter referred to as "public benefit receiving account information") (limited to cases where the insured person wants) can be confirmed by inquiring from the relevant information holding organization through an information providing network system (※3).

(5) Verifying the target persons who engage in affairs of issuing and managing such as reissuing health insurance cards and issuing aged recipient proofs and referring to their qualification related information, etc. by using the individual numbers

(6) Referring to qualification related information concerning the notification about standard remuneration such as monthly salary changes, calculations, and bonuses, etc.

(※1) Myna Portal is an online service operated by the government, and RBHI online network connected to Myna Portal uses the online billing network (referred to below as "online billing NW") that has been utilized by connecting to Payment Fund. The operating main body of the Myna Portal is controlled on the system so that it cannot view the contents of the application data.

(※2) Personal number acquisition and basic 4 information acquisition from the Japan Agency for Local Authority Information Systems are made by immediate inquiries via Payment Fund through an intermediary server or by file batch inquiries.

(※3) Inquiries about personal information from previous insurers, etc. is made within a intermediary server, etc. of Payment Fund using insured person's sub-number, and inquiries about information from related information holding institution through an information provision network system is made by conveying the reference data which have the insured person's sub-number to the inquiry data which have institutional codes using an intermediary server, etc. of Payment Fund.

2. Affairs of paying insurance benefits (affairs handling qualification related information, etc. concerning payment decision for members)

(1) Verifying an individual number and reference to qualification-related information using the individual number in cases where an individual number appears on an application form for payment of statutory benefits such as injury and sickness allowance, childbirth and childcare lump-sum grant, funeral expenses, etc.

(2) Indexing information such as calculation conditions by individual numbers pertaining to the calculation of statutory benefits and additional benefits

	<p>(3) In cases where it is necessary to verify benefit requirements in the determination of benefits, inquiring about such benefit requirements from other information holding bodies and verifying them using an information providing network system (※3)</p> <p>(4) Registering members' benefit related information on an intermediary server etc. for information sharing</p> <p>(5) Verifying the target persons who engage in affairs of issuing and managing such as reissuing health insurance cards and issuing aged recipient proofs and referring to their qualification related information, etc. by using the individual numbers when conducting affairs of issuing and managing limited amount application certificates and other benefit related certificates, notifications of medical care allowances, etc.</p> <p>3. Affairs of collecting insurance premiums (affairs handling qualification related information, etc. concerning collection of premiums, etc.)</p> <p>(1) Indexing information such as calculation conditions by individual numbers pertaining to the calculation of insurance premiums etc. of voluntarily continuing insured persons</p> <p>(2) Referring to qualification related information by using individual numbers in affairs pertaining to insurance premium collection, such as the collection of insurance premiums of voluntarily continuing insured persons, management of payment default, refunds upon loss of qualification, etc.</p> <p>(Appendix) Regarding the payment of such as benefits and refunds, the "Law concerning Registration, etc. of Deposit and Savings Accounts for the Prompt and Sure Implementation of Payment of Public Benefits" came into effect in January 2022, only when the insured person wants to use the public benefit receiving account information, the information inquiry has been made possible through the information provision network system, and such insured person can obtain the public benefit receiving account information from the account information registration system (Digital Agency) so as to utilize it for the administrative processing such as money transfer, etc.</p>
③ Title of systems	<p>1. Core system for health insurance society affairs (referred to below as "core system")</p> <p>2. Intermediary server etc. for medical insurers</p> <p>3. Electronic application data. Download AP (referred to below as "Download AP")</p>

2. Specific Personal Information File Name	
Health insurance key information file	
3. Use of individual numbers	
Legal basis	<ul style="list-style-type: none"> Numbers Act, Article 9-1 (Range of Use) Appended Table 1, Item 2 Orders Stipulating Affairs as Prescribed by the Ordinances of Competent Ministries in the Numbers Act, Appended Table 1 Article 2 Basic Resident Registration Act, Article 30-9 (Provision of identity verification information to a national organ)
4. Information Sharing by Information Providing Network System	
① Implemented or not	<p>[Implemented]</p> <p><Select from following options></p> <p>(1) Implemented</p> <p>(2) Not implemented</p> <p>(3) Undecided</p>
② Legal basis	<ul style="list-style-type: none"> Numbers Act, Article 19-7 (Restrictions on the Provision of Specific Individual Information) (Referring) Appended Table 2, Item 3 Orders Stipulating Affairs and Information as Prescribed by the Ordinances of Competent Ministries in the Numbers Act, Appended Table 2 Article 3 (Providing) Appended Table 2, Items 1, 2, 3, 4, 5, 9, 12, 15, 17, 22, 26, 27, 33, 39, 42, 43, 58, 62, 78, 80, 87, 93, 97, 106, 109, 119, 120 Orders Stipulating Affairs and Information as Prescribed by Ordinances of Competent Ministries in the Numbers Act, Appended Table 2 Articles 1, 2, 3, 4, 5, 8, 10-2, 11-2, 12-3, 15, 19, 20, 22-2, 24-2, 25, 25-2, 31-2, 33, 41-2, 43, 44, 46, 49, 53, 55-2, 59-3 (Basis for entrusting) Health Insurance Act, Article 205-4-1, -2 <p>RBHI entrusts the affairs of information enquiring and providing through an information providing network system to Payment Fund, pursuant to the provisions of the Health Insurance Act. RBHI uses information obtained through the information providing network system in affairs such as health insurance benefit payments, but the body that connects to the information providing network system is the Payment Fund.</p>
5. Department Concerned within Assessment Implementing Body	
① Department	General Affairs Section, Bosch Health Insurance Society
② Title of Supervisor	Chief Administrative Officer (CAO)
6. Other Assessment Implementing Bodies	
None	
7. Requests to Disclose, Amend, or Prevent Use of Specific Personal Information	
Contact	General Affairs Section, Bosch Health Insurance Society Executive Office 2-5-5 Yakyucho, Higashimatsuyama, Saitama 355-0028 Tel: 0493-22-0890
8. Inquiries about Handling of Specific Personal Information Files	
Contact	General Affairs Section, Bosch Health Insurance Society Executive Office 2-5-5 Yakyucho, Higashimatsuyama, Saitama 355-0028 Tel: 0493-22-0890

II Threshold Determining Items

1. No. of target people

How many target people do assessment target affairs?	[10,000 to 99,999]	<Select from following options> (1) Under 1,000 (arbitrary implementation) (2) 1,000 to 9,999 (3) 10,000 to 99,999 (4) 100,000 to 299,999 (5) 300,000 or more
Date of count?	As of June 28, 2019	

2. No. of handlers

Are there 500 or more people handling specific personal information files?	[Under 500]	<Select from following options> (1) 500 or more (2) Under 500
Date of count?	As of June 28, 2019	

3. Serious accidents

Did any serious accidents related to specific personal information occur in assessment agencies over the last year?	[No]	<Select from following options> (1) Yes (2) No
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III Threshold Determining Results

Threshold determining results

Implementation of basic assessment is obligatory.

IV Risk Measures

1. Types of specific personal information protection assessment report to be submitted

[Basic Assessment Report]	<Select from following options> 1) Basic Assessment Report 2) Basic Assessment Report and Focused Assessment Report 3) Basic Assessment Report and Full Assessment Report
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For the organization that selected either 2) or 3), details of risk measures are described in Focused Assessment Report or Full Assessment Report respectively.

2. Obtaining specific personal information (except for obtaining through an information providing network system)

Are the measures against the risk of acquisition other than the intended purpose sufficient?	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
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3. Use of specific personal information

Are the measures against the risk of linking beyond the purpose or linking with information not necessary for affairs sufficient?	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
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Are the measures against the risk of unauthorized use by unauthorized persons (former staff, staff without access right, etc.) sufficient?	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
4. Outsourcing of handling specific personal information [Don't outsource]		
Are the measures against the risk of unauthorized use, etc. by entrustees sufficient?	[]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
5. Provision / transfer of specific personal information (excluding entrustment and provision through an information provision network system) [Don't provide / transfer]		
Are the measures against the risk of unauthorized provision / transfer sufficient?	[]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
6. Connection to an info. providing network system [] Don't connect (acquisition), [○] Don't connect (provision)		
Are the measures against the risk of acquisition other than the intended purpose sufficient?	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
Are the measures against the risk of unauthorized provision sufficient?	[]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
7. Storage / deletion of specific personal information		
Are the measures against the risk of leakage / loss / damage of specific personal information sufficient?	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues
8. Audit		
Implemented or not?	[○] Self-check	[] Internal audit [] External audit
9. Training and awareness raising for employees		
Training and awareness raising for employees	[Putting special effort]	<Select from following options> 1) Putting special effort 2) Sufficient 3) Still remain issues

