



RIPE NCC
RIPE NETWORK COORDINATION CENTRE

RIPE Database & GDPR

Maria Stafyla
Legal Counsel
RIPE NCC

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Some Background



Directive 95/46

- The RIPE NCC is already covered by the EU Data Protection Directive
- In 2006, the RIPE community established the Data Protection Task Force (DPTF)
- Data Protection Report

<https://www.ripe.net/about-us/legal/ripe-ncc-data-protection-report>

Work by DPTF



- Implemented procedures/mechanisms to control personal data exposure; 'mnt-by' attribute mandatory for all objects
- Defined the purpose for processing personal data in the RIPE Database - mentioned in the RIPE Database Terms and Conditions
- Enforced the RIPE Database Terms and Conditions as the applicable framework for the use of the RIPE Database
- Introduced procedure for removal of personal data upon request by the relevant individual
- Automate removal of unreferenced personal data
- Restrict unlimited access to personal data contained in the RIPE Database; RIPE Database Acceptable Use Policy and changes in NRTM service



GDPR

Our Implementation Approach



Our approach

- Legal review
- Engaged with external legal counsels and industry partners
- Following relevant developments
 - ICANN WHOIS discussions - fundamentally different from the RIPE Database
- Raise awareness about the purpose of the RIPE Database
- Published Labs Articles



Legal Review

Personal Data Principles

Legal Review



- Analysed the current state of play:
 - Based on the work done by the DPTF
 - In line with the basic principles of processing personal data and the GDPR
 - Keeping in mind our role as a **Regional Internet Registry**

RIPE Database - Purpose



- Defined in Article 3 of the RIPE Database Terms and Conditions

“Facilitating coordination between network operators (network problem resolution, outage notification, etc.)”

- Publicly available contact information of individuals is crucial for this purpose
 - E.g. cases of cyberattacks, quick contact among operators that have no direct (business) relationship

RIPE Database - Legal Grounds



- Depending on the role, legal grounds for processing of personal data in the RIPE Database varies:
 - Contact information of resource holders is carried out for the legitimate interest of the Internet community and the Regional Internet Registry system
 - If the resource holder wants to insert the contact information of another individual, their consent must be obtained, e.g. via employment or business relationship

RIPE Database & Responsibilities



Related party	Lawfulness	Fairness and Transparency	Purpose Limitation	Data Minimisation	Accuracy	Storage Limitation	Integrity and Confidentiality
Resource Holder's contact information	The legitimate interest of the RIPE community	Shared responsibilities between the RIPE NCC and resource holder to provide clear information about the purpose for which the personal data is collected, how is it going to be used, the rights of the individuals, etc.	Shared responsibilities between the RIPE NCC and the resource holder to inform the relevant individual about the purpose of processing of their personal data in the RIPE Database.	Shared responsibilities between the RIPE NCC and the resource holder to keep the personal data limited to what is necessary for the purposes of the RIPE Database.	Shared responsibilities between the RIPE NCC and the resource holder to keep the personal data accurate and, if inaccurate, to erase or rectify it.	Shared responsibilities between the RIPE NCC and the resource holder to keep the personal data in the RIPE Database for as long as necessary for the purpose of processing.	Existing procedures: <ol style="list-style-type: none"> 1) RIPE Database Acceptable Use Policy 2) NRTM service without personal data returned 3) Use of the RIPE Database against the agreed purposes- > repercussions
Contact persons' contact information	Individual's consent						

Outcome



- Shared responsibilities between the RIPE NCC and the resource holders
- Responsibilities and obligations arising from:
 - The Law
 - RIPE Policies
 - The RIPE Database Terms and Conditions



Identified Issues

Historical Queries - NIC Handles



- NIC handles of historical **person** and **role** objects
- A historical contact person may still be identified:
 - Not inline with the purpose of the RIPE Database
 - Not inline with the data protection legislation
- Uncertain if the result will refer to the correct person- NIC handles were reused until 2009

Historical Queries - Contact Details



- Historical contact details of (historical) resource holders are returned
- If a historical resource holder was an individual, historical personal data will be returned:
 - Not inline with the purpose of the RIPE Database
 - Not inline with the data protection legislation



How to Solve This

- Filter out NIC handles of historical **person** and **role** objects
- Filter out historical contact details of (historical) resource holders:
 - Align with the rules of FTP files
 - Filter out 'notify' attribute

Searches for Individuals



- No restrictions when searching for an individual:
 - Every object containing any of the search criteria will be returned
 - Full object details will be returned, no matter if the object is related or unrelated to the search criteria
- Is the unlimited search of individuals in line with the purpose of the RIPE Database and proportional?



How to Solve This

- Identifying ways to restrict unlimited personal data exposure
- Change the default search options:
 - Do not retrieve related objects
 - Do not show full object details

Contact Person's Consent



- Contractual responsibility of the maintainer
- **Person** objects created during the membership enrolment process
- What are the options for getting a contact person's consent before an object is created for them?
- Reason this is required: allows the RIPE NCC to demonstrate consent



Work In Progress

Documentation Review



- Reviewing documentation and information provided by the RIPE NCC:
 - e.g. during membership enrolment process, creation of objects, etc.
- Remind resource holders and users of their responsibilities and rights when inserting personal data in the RIPE Database

Goals of Documentation Review



- Clear and transparent information:
 - For the individuals and their rights
 - About the responsibilities of the related parties
- Demonstrate accountability and due diligence



Ongoing Work

- Keep engaging with the RIPE community, industry partners and stakeholders
- Continue monitoring and ensuring compliance with the legal obligations

Compliance does not end on May 25th!



Questions



mstafyla@ripe.net