



RIPE NCC
RIPE NETWORK COORDINATION CENTRE

RIPE NCC and the GDPR

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Some Background

Directive 95/46



- The RIPE NCC is 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>

General Data Protection Regulation



- Regulates how and under what conditions **personal data** may be processed
- Rights of individuals
- Responsibilities and obligations of the responsible parties
- Becomes applicable on **25 May 2018**



GDPR

Our Implementation Approach

Our Goals



- Identify and classify the data the RIPE NCC has in its repository and that it processes
- Ensure ongoing compliance with GDPR and other related legal frameworks
- Implement an efficient Privacy Risk Management framework

First Steps



- March 2017 - established an internal project
- Cross-functional project team
- Support by every department



Work So Far

Reviewed RIPE NCC Services



- Identified processes and services where personal data is involved
- Classified the various data sets according to their criticality and sensitivity
- Reviewed obligations, documentation and new legislation elements
- Implemented changes and made amendments

Reviewed Third-Party Contracts



- Signed data processing agreement
 - Performance management software, emergency hotline outside working hours tool, etc.
- Updated internal procedures
 - Company laptop policy, recruitment process

Engagement and Awareness



- Engaged with industry partners
- Kept the RIPE community and colleagues in the loop
- Published RIPE Labs articles

More to follow!



Reviewed Services

RIPE Database



- Current state of play - reviewed and approved by the Data Protection Task Force (2006-2010)
- Re-evaluated in line with GDPR
- Identified issues
- Discussing how to implement the necessary changes

Contact and Application Forms



- Reviewed internal processes
 - What data is necessary?
 - For what reason?
 - Who has access?, etc.

- Resulted in updated privacy texts
 - Clear and transparent communication to the individual

Data Breach Notification Procedure



- Obligation to report to the authorities a personal data breach
- In the Netherlands, this obligation exists since 2016
- Reviewed our existing procedure in line with GDPR
- Reminded our colleagues

Data Protection Officer



- Obligation under certain circumstances
- Not required for the RIPE NCC



In Progress

Attendees' Personal Data



- Registration process
- Visa invitation letters are often required
- Attendee lists
 - For how long should they remain publicly available?

Mailing Lists



- Reviewing subscription and removal process
- Mailing list archives
 - Remain publicly available
 - Reason: Transparency and accountability of the Policy Development Process
 - Is there a difference between the RIPE NCC membership and RIPE community mailing lists?

Privacy Statement



- We already provide a good overview of how we process personal data
- Continue to give clear and transparent information
- Maintain the layered structure
 - Easy to navigate to the relevant section

RIPE Atlas



- Review core service and related processes, e.g. RIPE Atlas ambassadors
- RIPE Atlas pages and information provided to the users

Records of Processing Activities



- Non-public register of processing activities involving personal data
- Obligation under certain circumstances
- Yes for the RIPE NCC
- Benefit:
 - Respond efficiently to data subjects' requests
 - Demonstrate accountability to authorities



What's Next?

RIPE Registry Data



- Non-publicly available (personal) data
- Historical information important for the integrity of the Registry
 - Resolving possible future disputes over Internet number resource registration
 - Chain of custody

Other RIPE NCC Services, Tools



- More RIPE NCC services
 - e.g. Training Services, SSO accounts, websites operated by the RIPE NCC
- Third-party contracts for external tools and software
- Implement internal policies on data access and availability (not only personal data-related)
- Establish an efficient Privacy Risk Management framework

Our Message on GDPR



- Legal obligation to continue monitoring and ensuring compliance
- Balance between our role as Regional Internet Registry, the interests of the RIPE community and legal framework

Compliance does not end on May 25th!

25 May 2018...

