

# Procedure for the Removal of Personal Contact Details from the RIPE Database

## Introduction

The RIPE NCC is authorised by the RIPE community to act as the registration authority for Internet number resources in its service region and to manage the operation of the RIPE Database. Many of the operational responsibilities for data handling are delegated to the individuals who have **mntner** objects in the database. These individuals, or Maintainers, maintain sets of data related to their network operations. If one of these Maintainers fails to fulfill their Data Protection responsibility, the RIPE NCC has a legal obligation to step in. This may require the RIPE NCC to modify or delete personal Contact Details. RIPE NCC has been tasked by the RIPE Community to keep an accurate register of Internet number resources. The procedure outlined in this document balances maintaining accountability with privacy rights of individuals.

## Definitions

In this document, the following terms shall be understood to have the meanings assigned to them below:

**Registrant** - a natural person or legal entity to whom an Internet number resource has been registered or who has registered any other primary object in the RIPE Database by specific or general agreement with the RIPE NCC

**Maintainer** - any Registrant or person to whom the authority to Update has been delegated by a Registrant either directly or indirectly, and who holds an identifier which allows updates to be authenticated

**Data Subject** – a person whose personal Contact Details are recorded in the RIPE Database.

**End User** – a person for whom an Internet number resource has been Registered for their use.

**RIPE Community** - RIPE (Réseaux IP Européens) is a collaborative forum open to all parties interested in wide area IP networks in Europe and beyond. The objective of RIPE is to ensure the administrative and technical coordination necessary to enable the operation of a pan-European IP network.

**RIPE NCC** - Réseaux IP Européens Network Coordination Centre. A membership association under Dutch law operating its registered office in Amsterdam, the Netherlands.

**Contact Details** - all details relating to name, postal address, phone, fax, e-mail or any other form of electronic communication that is used by a natural person or a legal entity

**Internet number resource** - globally unique address space (IPv4 and IPv6) and Autonomous System Numbers (ASNs) issued by any Internet Registry. These resources are not items of property and have no 'owner', only Registrants.

Internet Registry – Any registry that makes Internet number resources available to other people and records information in a database about the Registrant.

## General

Personal Contact Details are held in several object types. (See Appendix B for details.) The **person** object is the starting point for all data sets in the RIPE Database and this procedure will focus on **these** objects.

Changes to personal Contact Details can have significant consequences. To change or remove personal Contact Details may require:

- references to be removed from other objects
- for some other objects to be deleted
- Internet number resources to be returned to the appropriate Internet Registry
- to loose control and/or right of usage of the Internet number resource

The precise course of action depends on the types of objects where the **person** object is referenced. RIPE NCC has a legal obligation to remove personal Contact Details on request from the Data Subject in most situations. If the Data Subject is the Registrant of an Internet number resource and wishes to remain the Registrant of that resource, their personal Contact Details may not be removed. However, if the Data Subject is an End User of an Internet number resource 'managed' by an Internet Registry, their personal Contact Details can be replaced by Contact Details for the Internet Registry.

The first set of options which are available are:

- Insert personal Contact Details for some other person from the Data Subject's organisation.
- Insert Contact Details related to the Maintainer of the resource, if this is not the Data Subject. This option is only available if the Maintainer agrees or the Maintainer is also the Registrant.
- Insert Contact Details related to the organisation responsible for the parent resource (providing that is not the RIPE NCC). In this case responsibility for maintaining the data should also pass to this parent resource organisation if they are not already the Maintainer. This option is only available if the parent resource organisation agrees.
- Deny the request to remove personal Contact Details if the Data Subject is the Registrant and does not wish to return the resource or the Data Subject is the Maintainer and does not wish to release control over the resource and other options are not available.

The Data Subject should be aware of the consequences of personal Contact Details removal where the options above are not possible or acceptable. The Data Subject cannot maintain an Internet number resource and be anonymous. Where accountability conflicts with privacy, drastic action may be required. This may involve returning Internet number resources to the Internet Registry which issued them and removing all associated data from the RIPE Database.

## Historical Data

A Data Subject may request that their personal Contact Details are completely removed from the RIPE Database. This would include removing the non public historical records. However this conflicts with Dutch national security and international considerations for investigating serious Internet crime. If we delete historical records we can no longer identify the End User, Maintainer or Registrant of an Internet number resource at some instant in time. Therefore at this moment we would refuse to remove any non public historical data without a court order to do so.

## Procedure

We have tried to clearly identify a series of steps which can be taken at different stages. The aim is to resolve the issue to the satisfaction of all parties and protect everyone's interests, while maintaining the RIPE NCC's responsibility as a public registry of Internet number resources. RIPE NCC will always inform the Data Subject within four weeks, whether or not a request for change or removal of Contact Details will be granted.

1. The RIPE NCC is contacted by a Data Subject asking for their personal Contact Details to be removed from the RIPE Database. The Data Subject must clearly identify the details which they are referring to by sending a copy to the RIPE NCC.
2. The RIPE NCC forwards the request to the Maintainer of the **person** object and cc: the Data Subject. The Maintainer is asked to resolve the issue within ten working days and send confirmation to both the RIPE NCC and Data Subject.
3.
  - a. If the RIPE NCC receives confirmation from the Maintainer that action has been taken, we notify both the Maintainer and the Data Subject that the case is closed.
  - b. If no confirmation is received from the Maintainer, but the **person** object has been deleted or substantially changed, we notify both the Maintainer and the Data Subject that the issue has been resolved and the case is closed.
  - c. If no confirmation is received from the Maintainer, and nothing changed, the RIPE NCC contacts the Data Subject and copies the message to the Maintainer. The Data Subject is asked to confirm that they still want the personal Contact Details removed. If they confirm this, the RIPE NCC moves to step 4.

The following steps are the actions the RIPE NCC has to take when the Maintainer does not respond to or does not comply with the request.

4. The RIPE NCC asks the Data Subject for a copy of a legal identification document. This document must match the personal Contact Details to be removed. This should be faxed along with a formal request for the personal Contact Details removal.
5. The RIPE NCC receives the signed request and identification document from the Data Subject.
6. If it is a simple case where:
  - the **person** object is unreferenced.
  - each object referencing the **person** object references more than one **person** object.the RIPE NCC removes any references, where necessary, and deletes the **person** object.

7. **a.**For a simple case the RIPE NCC sends an acknowledgement to the Data Subject and the Maintainer informing them that the personal Contact Details have been removed and closes the case.
7. **b.**For anything other than one of the simple cases, the RIPE NCC continues with the following steps..
8. The RIPE NCC sends a statement to the Data Subject of actions to be taken which includes a list of any other data that may be affected which is directly related to the **person** object and the changes necessary to this data. This list will highlight any resources that will need to be returned to an Internet Registry or transferred to another Maintainer and the possible consequences of this action. These consequences may include the removal of some data from the RIPE Database.
9. When any data is removed from the RIPE Database, there can be a chain reaction. This is because of the referential integrity rules applied within the RIPE Database. This may result in more data to be changed or removed. The Maintainers of any such data will be informed and requested to make the appropriate changes. These changes will have to be made before the Data Subjects details can be removed as no object can be deleted from the RIPE Database while it is still referenced.
10. If data has to be transferred to another Maintainer and they are not willing to be the Maintainer of this data, either the resource must be returned or the personal Contact Details cannot be removed. In the former case, if the Data Subject confirms the action, the RIPE NCC moves into the cleanup phase. In the latter case no further action is possible and the case is closed..
- 11.**a.**If the Data Subject confirms the action in the statement, the RIPE NCC moves into the cleanup phase.
- 11.**b** If the Data Subject does not confirm this action, no further action is possible and the case is closed.

## Cleanup Phase

These are the steps taken by the RIPE NCC when the removal of personal Contact Details is not a simple case. The actual implementation is very technical and requires some recursive searching for references.

The goal is to remove the **person** object containing the Data Subject's personal Contact Details. All reference chains must be followed and appropriate changes made as close in the chain as possible to the **person** object to maintain the referential integrity of the RIPE Database.

If an object needs to be deleted, special considerations may apply, depending on the object type. (See Appendix A) This may involve returning some resources to appropriate Internet Registries. If these resources are registered to the Data Subject requesting the personal Contact Details removal, they will be listed in the statement to the Data Subject along with the consequences. If they are managed by other Maintainers, the Maintainers will be notified and given an opportunity to change the references and take their resources off the list of affected objects. This must be done before the Data Subject's personal Contact Details can be removed.

## Conclusion

It is easier for all concerned if the Maintainers make any changes which are necessary. They are closer to the people involved and have a better understanding of

how to replace references to the Data Subject. If the RIPE NCC has to make changes it is because the Maintainer of this data has not taken the matter seriously. In this case the drastic actions detailed in this procedure, including requiring resources to be returned, are justified.

Because the procedure requires some drastic actions in some cases, it is important that the RIPE NCC can contact the correct people to inform them of the actions in advance. Currently the RIPE NCC has no authoritative contact for the Maintainer of many sets of data objects. We only have the set of e-mail addresses, phone numbers and addresses listed in the objects in the RIPE Database. None of these have been verified and some may prove to be invalid. It may be necessary for other Internet number resources to be returned to an Internet Registry from the chain of data relating to the Data Subject's **person** object for which the RIPE NCC cannot contact the Maintainer.

## Appendix A. Special Considerations for Object Types

This is a list of object types and required actions for when one of these objects references the **person** object to be removed which is the only **person** or **role** object referenced and there are no options available for changing the reference.

### Forward domain

This is a TLD problem. If they are not responsive, the TLD should remove its data from the RIPE Database.

### Reverse domain

These objects should be deleted and removed from the DNS system.

### inet(6)num

The address space must be returned to the appropriate Internet Registry and then the object can be deleted.

The RIPE NCC will take no action until the Data Subject has cancelled any routing arrangements for this address space to be returned and any related route(6) objects have been deleted.

### aut-num

These objects should be deleted.

The RIPE NCC will take no action until the Data Subject has cancelled any routing arrangements where this AS number is the origin and any related route(6) objects have been deleted.

### role

If the **role** object only references this one **person** object, find all the references to the **role** object and consider them as if they were direct references to the **person** object.

### mntner

Check all references to the **mntner**.

- Where there are references to more than one **mntner** in the same attribute type, remove the reference to this **mntner**.
- If it is referenced in an optional attribute, remove the attribute.
- Where an object references only this **mntner** in a single instance of a mandatory attribute, consider this object as if it had a single reference to the **person** object to be deleted. This object may also need to be deleted and then follow the chain of references to this object and handle all referencing objects according to this list.

When all references to the **mntner** object have been removed, delete the **mntner** object.

### **key-cert**

References to **person** objects are optional, so remove any reference to this **person** object.

### **irt**

Remove references to this **irt** object from **inet(6)num** objects, then delete the **irt** object.

### **organisation**

References to **person** objects are optional, so remove any reference to this **person** object.

## Appendix B. Object Types with Personal Data

Personal Contact Details are only held in these object types:

- **Person**
- **Role**
- **Organisation**
- **Irt**

**Role** object references can be replaced by one or more of the **person** objects it references.

**Organisation** object references are optional everywhere except in **inetnum** ALLOCATION objects. These references can simply be removed from anywhere else.

**Irt** object references are all optional. These references can also simply be removed.

In all cases the **role**, **organisation** and **irt** object can then be deleted when there are no references to it.

**Person** objects are discussed in detail in this procedure.