Preparing for the GDPR

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RIPE NCC

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General Data Protection Regulation

- Adopted in April 2017
- Replacing the EU Data Protection Directive
- In effect from May 2018
The RIPE NCC

• Not-for-profit

• Membership-based organisation

• The registration authority for Internet number resources in its service region
  - Operation of the publicly available RIPE Database
  - Maintenance of non public registration information

• Important role for the operations of the Internet globally
  - Accountability and clear governance procedures are vital!
Data Protection by the RIPE NCC

- The RIPE NCC already covered by the EU Data Protection Directive
  - Based in the Netherlands

- In 2006 the RIPE Community established the Data Protection Task Force (DPTF)
  - Mandate to recommend steps for the implementation of the Directive
  - Developed procedures and legal framework with the RIPE NCC

- Data Protection Report
Involvement in Legislative Discussions

• 2009 - EU public consultation on the legal framework for the fundamental right to protection of personal data

• The RIPE NCC submitted an opinion

“[…]

The RIPE NCC considers that personal data related to the operators of the Internet should be easily available to each other, both inside and outside the EU, in order for those individuals to be able to contact one another to coordinate the proper functioning of the Internet around the world.

[...]”
Today: Preparing for the GDPR

- GDPR a good opportunity for a general review of all data sets processed by the RIPE NCC
- March 2017 - establishment of internal project
  - Review all personal data processed by the RIPE NCC
  - Project team consists of two legal counsels and two security officers
  - Support by colleagues of all department
  - Engagement of external legal counsels, industry partners etc.
  - Communication and consultations with RIPE community is essential
Work So Far

• Catalogue of all data sets processed by the RIPE NCC

• Reviewing compliance with GDPR

• Areas of focus
  - RIPE Database
  - Retention of personal data
  - Internal process of all personal data
  - Other RIPE NCC services
The RIPE Database (1)

• The purpose described in Article 3 of the RIPE Database Terms and Conditions
  - Established by the RIPE Community and the Data Protection Task Force

• Among others, it states:
  - “Facilitating coordination between network operators (network problem resolution, outage notification etc)”

• For this purpose, crucial to have publicly available contact information of individuals
  - E.g. cases of cyber attacks, quick contact among operators that have no direct (business) relations
The RIPE Database (2)

- **Legal basis for the processing**
  - Sharing contact information by the resource holders is part of their responsibility
  - If contact information of resource holder’s employee —> legal basis depends on their working relationship
  - If contact information of resource holder’s customers —> depends on customer’s responsibilities
  - Personal data removal procedure:
More Details on RIPE Labs

How We're Implementing the GDPR: The RIPE Database
Athina Fragkouli — 01 Feb 2018

We've heard feedback that there's a lot of interest in the way personal data is processed in the RIPE Database and how it will be affected by the GDPR implementation. Spoiler alert: our assessment indicates that current operations are in line with the legislation. ... [Read more]

Tags: gdpr database legal

https://labs.ripe.net/gdpr
Retention of Personal Data

• Personal data maintained for as long as justified by the purpose of obtaining it
• Carefully review the purpose for every data set
• Focus on RIPE Registry data
  - Information about old non-publicly available personal data
  - Registry role similar to Land Register
  - Historic information important in resolving possible future disputes over Internet number resource registrations
Internal Processing of Personal Data

• Review of internal policies, including:
  - Who is authorised to have access
  - How personal data is stored (security aspects)
  - Making sure we comply to all GDPR aspects
Other RIPE NCC Services

• RIPE Atlas
• Meetings registration
• Websites operated by the RIPE NCC
Stay Tuned!

- Series of RIPE Labs articles describing the GDPR preparations
  - https://labs.ripe.net/gdpr

- Webpages dedicated to GDPR