



**RIPE NCC**

RIPE NETWORK COORDINATION CENTRE

# RIPE Database and Personal Data

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# RIPE Database

Background and Registration Data

# RIPE Database - Background



- Need for documenting the use of IPv4 address space in the RIPE region in a comprehensive way
- Publication of registration data
  - Stability and operational coordination of the Internet worldwide
  - Vital element for transparency and accountability

# RIPE Database - Registration Data



- Information for
  - Internet number resource registration
  - Internet routing policies
- Publicly available data
- Personal and non-personal data

# RIPE Database - Personal Data



- Refer to
  - Resource holders that are natural persons
  - Appointed contact persons



# **RIPE Database**

Directive 95/46 and the Database Task Force

# Directive 95/46



- RIPE community established the Data Protection Task Force (DPTF)
- Mandate to, inter alia, look at how personal data is processed in the RIPE Database
- DPTF active from 2006 to 2009
- Data Protection Report  
<https://www.ripe.net/about-us/legal/ripe-ncc-data-protection-report>

# Work Done by DPTF



- Implemented procedures/mechanisms to control personal data exposure
- Defined purpose for processing personal data in the RIPE Database - see RIPE Database Terms and Conditions
- Created and made the RIPE Database Terms and Conditions enforceable as the applicable framework for the use of the RIPE Database
- Introduced a procedure for the removal of personal data upon request by the relevant individual
- Automated removal of unreferenced personal data
- Restricted unlimited access to personal data contained in the RIPE Database; RIPE Database Acceptable Use Policy and changes in the NRTM service



# 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) relationships



# **RIPE Database**

GDPR and our Review

# GDPR and Our Review (I)



- Based on
  - Work done by the DPTF
  - Purpose defined by the RIPE community
  - Discussions with the RIPE community
  - Inline with the basic principles of processing personal data
  - Keeping in mind our role as a Regional Internet Registry

# GDPR and Our Review (II)



- Kept our community informed about
  - Outcome of our review
  - Identified issues
  - Proposed solutions
- RIPE 76 DB WG session  
<https://ripe76.ripe.net/programme/meeting-plan/db-wg/>
- RIPE Labs articles  
<https://www.ripe.net/about-us/legal/corporate-governance/gdpr-and-the-ripe-ncc>



# **RIPE Database**

Recent Developments

# RIPE 77 DB WG session



- Discussion on

**Are PERSON objects still required for the defined RIPE Database purposes?**

- Requirement for personal contact details was challenged
- First time the RIPE community questioned the purpose that justifies the processing of personal data in the RIPE Database

# What's Next



- Current discussions on what is best way to start an efficient dialogue
- Need to re-evaluate the purpose of the RIPE Database according to our community's operations and needs
- If its purpose changes, we will re-review our position and ensure compliance

# Our Message



- RIPE Database and the RIPE community are dynamic in their nature
- We will keep monitoring and ensuring compliance so long as our community's needs change and evolve





# Questions



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