



RIPE NCC
RIPE NETWORK COORDINATION CENTRE

Preparing for the GDPR

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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
 - <https://www.ripe.net/about-us/legal/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 (names, bank details, emails etc)
- 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
 - Eg. cases of cyber attacks, quick contact among operators that have no direct (business) relations

The RIPE Database (2)



- Consent from individuals
 - Contact information filled in by the resource holders themselves
 - If contact information of resource holder's employee —> consent must be obtained from the employee based on their working relationship
 - If contact information of resource holder's customers —> consent must be obtained from the customers based on their customer contract
 - Personal data removal procedure:
 - <https://www.ripe.net/manage-ips-and-asns/db/support/documentation/removal-of-personal-data>

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
 - First article published:
 - <https://labs.ripe.net/Members/Athina/how-we-re-implementing-the-gdpr>
 - More to come this month
- Webpage dedicated to GDPR
 - <https://www.ripe.net/about-us/legal/corporate-governance/gdpr-and-the-ripe-ncc>



Questions



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