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
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
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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